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ABSTRACT

Four papers address approaches to evaluate the implementation of the individualized education program (IEP) provisions of P.L. 94-142, The Education for All Handicapped Children Act. The papers are "Auditing the IEP System: A Self-Audit System for Use by Local Education Agencies" by Beth Stephens and Daniel Macy, which examines a 10-step self study approach; "Education Theory and Evaluation Criteria for Individualized Education Programs" by Richard Iano, which contrasts the effects of two belief systems on the IEP criteria; "The Individualized Education Program (IEP) as a Vehicle for Delivery of Special Education and Related Services to Handicapped Children" by Hill Walker, which addresses IEP processes corresponding to the letter and the spirit of the law; and "A Planned Change Approach to the Implementation of the IEP Provision of P.L. 94-142 by Patricia Gillespie which examines a systems approach. Responses to the papers by a panel of educators are summarized and followed by recommendations for guides or models which would offer alternative self-study techniques to LEAs. (CL)

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Exploring Issues in the Implementation of P.L. 94-142

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Developing Criteria for the Evaluation of Individualized Education Program Provisions

Department of Health, Education and Welfare
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FOREWORD

The papers printed here were commissioned by the Bureau of Education for the Handicapped to investigate issues of quality in the implementation of the Due Process Procedural Safeguards provisions of P.L. 94-142 (Section 615 of the Education of the Handicapped Act). A panel of educational practitioners was also convened to discuss the papers and provide recommendations to the Bureau. Their comments, together with the papers, represent the most recent thinking and activities of a number of highly qualified professionals. While the views expressed in the papers are those principally of the authors, each writer has drawn upon the experiences, writings, research, and observations of various other educators in addition to their own. The care with which both the authors and the panelists shared their thoughts and ideas is obvious throughout this publication. It is our hope that this document will not only be informative, but that it will stimulate other thoughts on the evaluation of effectiveness of implementation.

Edwin W. Martin
Deputy Commissioner
Bureau of Education for the Handicapped

ACKNOWLEDGEMENTS

Many have helped BEH in conducting the Criteria Study. Special thanks are due to staff at Buffington & Associates who played an important role in arranging the panel meeting and assembling the developed papers into this monograph. Appreciation is extended to Adrienne McCollum for her overal project direction, and to Angela Edwards, Assistant Project Director, for coordination of the countless details involved in setting up the panels and producing the monograph. Acknowledgement is also made of the efforts of Frances Fuchs in assistance with the development of study questions for the panel, and P. W. Robinson for support services.

As considerable "in-house" efforts also went into this study, special thanks are also in order for State Program Studies Branch staff – Mary Kennedy, Kathleen Fenton, Lou Danielson, Pat Morrissey, and Jim Maxwell – for review of drafts of the study papers. Finally, appreciation is extended to the authors of papers, and other panel participants, for their insights and suggestions.

Linda G. Morra
Project Officer
Bureau of Education for the Handicapped

PART A

Introduction: Overview of the Study

Linda G. Morra

Bureau of Education for the Handicapped

A major purpose of Public Law 94-142, the Education for All Handicapped Children Act of 1975, is to assure that all handicapped children have available to them a free appropriate public education which emphasizes special education and related services designed to meet their unique needs. According to the law, an Individualized Education Program (IEP) is to be developed and reviewed jointly for each handicapped child by a qualified school official, by the child's teacher or teachers, the parents or guardian, and, when appropriate, the child. The developed IEP document is to specify the child's present level of educational performance, annual goals, short-term instructional objectives, the types of educational and/or related services the child is to receive, a time line for the delivery of those services, the extent to which the child will be able to participate in regular education programs, and objective criteria and evaluation procedures and schedules. The IEP document serves as a guide for the delivery of special education and related services to the child.

How can one evaluate the quality of individualized education programs or the process by which they are developed? This question is of relevance to the Bureau of Education for the Handicapped (BEH) and state and local education agencies, but for differing reasons. While the monitoring efforts of the BEH are intentionally limited to compliance determinations, with emphasis on State rather than local compliance, BEH is interested in the development and dissemination of best-practice implementation procedures. In addition, Section 618 of P.L. 94-142 indicates that the Congress is interested in the development of evaluation methodologies, an activity which would be supported by BEH, but directed towards state needs. State education agencies (SEAs) are responsible under P.L. 94-142 for monitoring local implementation of the IEP provisions and providing technical assistance to LEAs. The states are also required to develop standards for implementation of the law, including the IEP provisions. Thus, the question has relevance for SEAs. Finally, it is at the local education agency (LEA) level that P.L. 94-142 is truly implemented. LEAs may be interested in conducting their own internal evaluations of implementation.

It is evident that in order for the above question to be addressed, criteria are needed which can be used to evaluate implementation. To stimulate thought regarding definitions of quality, the Bureau of Education for the Handicapped undertook a study in October, 1977 to explore issues of quality in implementation of four of the provisions of the Act. This monograph summarizes activities related to one of those provisions – Individualized Education Programs (IEPs). The study had two major parts. First, four papers were commissioned to provide professional judgements of quality implementation of the Individualized Education Program provisions of P.L. 94-142. Second, a panel of education practitioners was convened to discuss the papers and make recommendations to BEH concerning their value and use.

In conceptualizing the study, it was recognized that evaluation never takes place in a vacuum; standards are always involved. Judgements of the performance of a program or procedures, or judgements concerning the quality of a product, are measured against either explicit or implicit standards. Standards are derived from experience, knowledge, and/or values. The difficulty recognized is that standards will vary according to whose experience, knowledge, and values serves as the basis for standards. For example, criteria for the evaluation of IEPs will vary depending on whether one feels the IEP should be a direct instructional tool or whether one feels the IEP is simply a loose guide to the planning of a child's educational program. If, for example, the main function of the IEP is perceived to be its use as an instructional tool, criteria for evaluating the quality of the IEP document might include detailed specifications for short term objectives and judged utility as a diagnostic – prescriptive tool. If, on the other hand, the standard is that the IEP is a document which provides evidence that a planning process has been undertaken, an evaluation criterion might be that the quality IEP has judged utility as a record of the commitment of resources.

Because a variety of standards are possible, authors were selected for this study whose experience, knowledge, and values would tend to be disparate. Naturally, the four papers do not represent all the possible standards of quality which could be identified. They do represent, however, four different approaches to the difficult issue of quality in relation to implementation of the IEP provisions.

THE IEP POSITION PAPERS

Authors were provided guidelines which first expanded on the subject of qualitative implementation of the IEP provisions. Progress in implementation was conceptualized as a continuum; conformance with the letter of the law was viewed as one end of the continuum (minimal implementation), while a full meeting of the intent or spirit of the law would form the other (maximal) end of the continuum. Authors were to use this concept of progress in implementation in developing their papers.

Secondly, the guidelines requested that authors develop criteria that would be applicable at the LEA level. Thus, the developed criteria could be used by LEAs interested in evaluating their own progress in implementation of the IEP provisions, as well as by SEAs in conducting their own evaluations. The guidelines further indicated that criteria which would involve the collection of data either already available or relatively accessible to LEAs at a low cost of both time and money would be most useful.

Third, authors were requested to develop criteria for two specific IEP components: (1) the procedures undertaken by LEAs to develop, review, and revise IEPs, and (2) the IEP documents actually produced by LEAs. Thus, authors of IEP position papers were to develop criteria which could be used by LEAs as approximate indicators of the extent to which the procedures used to develop IEPs and the actual IEP documents themselves meet both the letter and intent or spirit of the law. In the interest of providing authors with a manageable task, authors were not asked to develop criteria for the third critical component, the actual implementation of IEPs. As will become evident in the following chapter, however, several authors chose to go ahead and address this additional component.

Fourth, authors were asked to provide a rationale or justification for their criteria. It was expected that P.L. 94-142 and its regulations would provide a base for the development of criteria. For those criteria used as indicators of maximal implementation, authors were expected to draw from theory, research findings, the Congressional Record, personal experience, or personal knowledge of current practices. Where criteria did exceed the requirements of the law and regulations, authors were to indicate that the criteria represented desirable but not mandatory standards.

Fifth, the guidelines acknowledged the interrelationship of the IEP provisions of P.L. 94-142 with other stipulated provisions – placement in the least restrictive environment. due process procedures, and protection in evaluation or non-discriminatory assessment procedures. Authors were requested, to restrict themselves as closely as possible to the IEP provisions. Several authors, however, felt comfortable in extending beyond the IEP provisions and they took a more wholistic approach to the task.

Finally, the guidelines requested that authors of IEP position papers consider different kinds of contextual influences on LEA implementation of the provisions. Variables for consideration included, for example, the urban, rural, or suburban nature of the LEA and the length of time the LEA had been implementing SEA policies similar to P.L. 94-142. Authors were to determine whether a general set of criteria for determining progress in implementation of the IEP provisions could be used in varied contexts, or alternately, whether multiple sets of criteria were needed for LEAs in varied contexts.

In the initial formulation of the study, some thought was given to later development of self-study guides which could be provided as a form of technical assistance to SEAs and/or those LEAs who wanted to evaluate progress in implementation. Over time, the position papers were conceptualized as an exploratory investigation concerning the feasibility of producing self-study guides on evaluation of implementation of the IEP provisions. The papers were not to be the prototype self-study guides. From their efforts to develop criteria, however, determination of the feasibility of the task might be made.

THE IEP CRITERIA STUDY PANEL

The second part of the study involved bringing together a group largely of educational practitioners to discuss the position papers and provide recommendations to BEH. More specifically, the purpose of the panel was stated as follows: To determine the feasibility of developing self-study guides which could be used by state and/or local education agencies to evaluate implementation of the Individualized Education Program provisions of P.L. 94-142. Feasibility was defined to include topics such as field-testing and dissemination, as well as content and format of possible guides.

The panel meeting was structured into three distinct parts. First, authors presented summaries of their papers and responded to questions. Second, a large group discussion was planned concerning issues related to the study. Finally, three small groups were formed to develop recommendations for BEH. For the second and third activities, study questions were distributed to panelists prior to the meeting. These questions were intended to stimulate discussion and the formulation of additional questions by panelists.

Questions for the large group session concentrated on the conceptualization of the study as presented in the guidelines for authors and also as presented by the actual position papers. For example, a series of questions addressed the concept of progress towards implementation, and questions were posed regarding whether all of the alternative criteria generated by the authors were indicative of implementation meeting the spirit of the law. One major question asked of the group was whether, in fact, the BEH could support any further activities based on this study without giving the impression that developed standards were Federal standards. It was stressed that BEH not only had no intention of imposing such standards, but also did not want to give the appearance of sanctioning specific standards. By legislative intent, SEAs have been given flexibility in implementation.

The group was then divided into three small working groups which developed specific recommendations on the possible development, field-testing, and dissemination of self-study guides. Specific questions posed for these groups involved the possible developers of the guides, comprehensiveness of developed guides as well as field-testing and dissemination efforts, the format of self-study guides and field-testing activities, and the utility of field-testing developed self-study guides. In addition, questions were asked which requested strategies for increasing utility of the guides to LEAs.

The number of panelists was intentionally designed to be small. It was felt that a small group would encourage an informal atmosphere and lively exchange of ideas. In selecting educational practitioners for the panel, emphasis was placed on representation from state and local education agencies.

The next part of this monograph presents the four position papers. As is soon evident upon reading the papers, the authors varied in their interpretations of the task, and their educational philosophies.

PART B

Approaches to Evaluate Implementation of the IEP Provision of P.L. 94-142

SECTION I

Auditing the IEP System: A Self-Audit System for Use by Local Education Agencies

Beth Stephens
Daniel J. Macy

STEPHENS, BETH. Dr. Stephens is the Department Head of the Special Education Program at the University of Texas at Dallas. Her research and training interests center on cognitive development in exceptional persons, programming for the severely and profoundly impaired persons, and implementation of P.L. 94-142. Dr. Stephens has served on the President's Committee on Mental Retardation and was President of the Division of Mental Retardation, Council for Exceptional Children. She has authored numerous journal articles, monographs, and books. As an active member of numerous organizations, Dr. Stephens is currently, Vice President of the Education Division, American Association on Mental Deficiency; Chairperson, Research Committee, Council for Exceptional Children; Member, Educational Advisory Committee, National Association for Retarded Citizens; Member, Advisory Committee on Children and Youth, American Foundation for the Blind; and President-Elect, the Foundation for Exceptional Children.

MACY, DANIEL J. Dr. Macy is currently supervisor of the special education component in the Department of Research, Evaluation, and Information Systems of the Dallas Independent School District, Dallas, Texas. He received his Ph.D. in 1972 from the University of Colorado, Boulder, Colorado, where he studied educational research and evaluation. His publications include numerous conference papers and journal articles addressing mainstream education, child find, and evaluation methodology for special education programs. Dr. Macy is a member of the American Educational Research Association and the Council for Exceptional Children where he presently serves on the Research Committee.

INTRODUCTION

As new systems and programs are implemented there is an accompanying recognition of the need to monitor their functioning, to determine what portions work in an expected manner and what portions require additional effort or, perhaps, revision. Thus, as Local Education Agencies (LEAs) strive to provide their handicapped pupils with the Individualized Education Programs (IEPs) described in Public Law 94-142 there is realization that the design and implementation of a system which provides IEPs will require monitoring. The operation of the system should be more efficient and effective if this monitoring is accomplished through a self-audit, rather than being held in abeyance until outside evaluation can be arranged, accomplished and reported. A desirable self-audit is one which can be utilized by LEAs and which provides specific information of the degree of success being experienced in the implementation of the various components entailed in the provision of IEPs. To provide LEAs with criteria which they can employ as they engage in a self-audit of their IEP system is the intent of the present document. In this document there is a listing of the ten basic steps that are required in the design, implementation and evaluation of an IEP. For each of these ten steps criteria or marker events are listed which can be used to determine the degree of success an LEA is experiencing in the achievement of that specific component. Following this listing there are discussions on methods to be used in the selection of an audit sample, in collecting and scoring audit data, and in follow-up revision or remediation of the IEP system. Use of this self-audit will provide an LEA with data on the strengths and weaknesses contained in their IEP implementation efforts.

CHAPTER I: PUBLIC LAW 94-142 AND THE INDIVIDUALIZED EDUCATION PROGRAM

The purpose of the 1975 Education for All Handicapped Children Act (Public Law 94-142) is: (1) to assure that all handicapped children have available to them a free appropriate public education which emphasizes special education and related services designed to meet their unique needs, (2) to assure that children's and parents' rights are protected, (3) to assist states and localities in the implementation of the legislation, and (4) to assure effectiveness of these efforts (National Association of State Directors of Special Education, 1976). Central to these provisions is the requirement that each handicapped pupil shall be provided an individually appropriate educational program. The regulations for Public Law 94-142 outline the procedures to be followed by the Local Education Agency (LEA) in the design implementation and evaluation of the pupil's Individualized Education Program (IEP).

The legislation contains two provisions which make it unlike other Federal education law. It has no expiration date; therefore it is viewed as a permanent instrument, and it sets forth as national policy the fundamental right of *all* handicapped persons to a public education (*American Education*, June, 1976).

Special Education is defined in the legislation as "free, specially designed instruction to meet a handicapped child's unique needs including instruction in the classroom, physical education, home, hospitals and institutions."

Related Services are defined as "transportation and supportive services including speech, audiology, psychological, physical and occupational therapy, recreation and medical and counseling (medical for diagnostic and evaluative purposes *only*) and can include identification and assessment of handicapping conditions."

Free appropriate public education is defined as "special education and related services which are at public expense, which meet SEA standards, and which include preschool training and an individualized education program." (National Association of State Directors of Special Education, 1976).

The policies contained in Public Law 94-142 are binding and state that there shall be:

1. Intensive and continuing effort to locate and identify youngsters who have handicaps, to evaluate their educational needs, and to determine whether those needs are being met;

2. education available to all handicapped children; priority will be given first to those who are not receiving education at all and second to the most severely handicapped within each disability who are receiving an inadequate education (Goodman, 1976);

3. policies and procedures, describing due process safeguards which parents/children can use to challenge decisions of state and local officials about how a child has been identified, evaluated or placed in a special education program; these safeguards must include:

    a. prior notice before a child is evaluated or placed in a special program;
    b. access to relevant school records;
    c. an opportunity to obtain an independent evaluation of the child's special needs;
    d. an impartial due process hearing to challenge any of the decisions described above; and
    e. the designation of a "surrogate parent" to use these safeguards for each child who is a ward of the state or whose parent or guardian is unknown or unavailable;

4. school placement in the least restrictive alternative; separate schools, special

or other removal of any handicapped child from the regular program are only allowed if and when the school district can show that the use of a regular educational environment accompanied by supplementary aids and services is not adequate to give the child what he/she needs;

5. non discriminatory testing and evaluation procedures showing that tests and other materials or methods used to evaluate a child's special needs are neither racially nor culturally discriminatory. The proceducres should also assure that whatever materials or methods are used, they are not administered to a child in a discriminatory manner;

6. procedures to guarantee that information gathered about a child in the process of indentifying and evaluating children who may have special educational needs, is kept confidential;

7. requirements that parents must be given the opportunity to see relevant school records before any hearing is held on a matter of identification, evaluation or placement of a special needs child." (The Children's Defense Fund, 1976, pp. 2-3);

8. state jurisdiction over all education programs for handicapped children offered within a given State, including those administered by a noneducation agency (a state hospital, for example);

9. an advisory panel appointed by each governor to advise the State's education agency of unmet needs, comment publicly on such matters as proposed rules and regulations, and help the State develop and report relevant data; membership on these panels will include handicapped individuals, and parents and guardians of handicapped children (Goodman, 1976);

10. an Individualized Educational Program (IEP) for each handicapped pupil; the program is to be developed jointly by a qualified school official, by the child's teacher, the parents or guardian, and where feasible the child himself.

In the term *Individualized Education Program*, "*Individualized* means that the program must be addressed to the educational needs of a single child rather than a class or group of children. *Education* means that the program is limited to those elements of the child's education that are specifically special education and related services as defined by the Act. *Program* means that the individualized education program is a statement of what will actually be provided to the child, as distinct from a plan that provides guidelines from which a program must subsequently be developed." (Torres, 1977, p. 5).

Written statements that are to be in the IEP include:

A statement of the child's present level of educational performance.
A statement of annual goals, including short term instructional objectives.
A statement of the specific educational services to be provided.
The extent to which the child will be able to participate in the regular education programs.
The projected date for initiation and anticipated duration of such services.
Appropriate objective criteria, evaluation procedures, and schedules for determining, on at least an annual basis, whether instructional objectives are being achieved (Torres, 1977 p. 6).

Although the plans which are formulated, implemented and evaluated will be contained in a document, which is termed the IEP, there is realization that an educational program is more than a document; instead, the document constitutes a recording of a process which is to be brought into being to meet the educational needs of a specific pupil. As the IEP is implemented a system for instructional service delivery is inaugurated which provides for the implementation, monitoring and evaluation of the instructional program (Morrissey and Safer, 1977).

As local Education Agencies (LEA's) seek to determine their progress toward implementation of the IEP provision of Public Law 94-142, criteria for implementation are necessary (Turner and Macy, 1978). To meet this need a systems flow concept is presented in succeeding Section II, Overview of the IEP System, which provides criteria that can be used by LEA's to monitor their implementation progress. In the ensuing discussion the total IEP phenomena is presented in the form of a self-audit system which can be used by the LEA to evaluate the quality of their instructional system. For example, a school may have provision for evaluation of the annual goals contained in IEPs, but a self-audit may reveal that there has been no collection of data upon which to base the evaluation.

CHAPTER II: OVERVIEW OF THE IEP SYSTEM

As review is made of the constellation of services that are required to provide a handicapped child with individualized education there is realization that the *written* educational plan serves as the *outline* for an educational service delivery system which is comprised of a coordinated set of consistent principles, rules and procedures which are to be followed by the service delivery personnel. A "system" is defined as a "number of activities united by some form of regular interaction or interdependence" (Lott, 1971); i.e. it is comprised of all of the tasks or events that must be effected in order to plan, provide, monitor and evaluate a handicapped child's public education. The basic stages in a system's development (Graham, 1972) should be observed by Local Education Agencies (LEA's) as they provide individual educational programs. Definition of these stages within the context of an IEP follows:

1. *Problem identification* occurs when pupil referral is requested and problems that led to referral are documented.

2. *Analysis* is made of the assessment information as review is given the evaluation team's statements on criteria which were used to determine eligibility of service and on pupil's present performance level.

3. *Design and specification of the proposed educational system or program* includes determination of potential areas for programming and formulation of annual goals and short term objectives and initial instructional activities, plus description of all related services and materials required to meet the individual educational needs of the child, and a statement of the extent to which the child will participate in the regular education program.

4. *Documentation, presentation and acceptance of the proposed educational system* is accomplished in a meeting attended by an LEA representative, the child's teacher, parents or guardian and, if appropriate, by the child; decision on pupil's placement also occurs at this meeting.

5. *Programming and preparation of operating documentation* is contained in written statements which set forth projected dates for initiation and duration of services as well as cost of formulating the IEP.

6. *Education* of personnel involved in systems delivery is preceded by a needs assessment which serves as a basis for the design and implementation of staff and parent training programs.

7. *System testing* is supplied through design and trial application of objective criteria and evaluation procedures.

8. *Implementation* of the educational system is achieved by the teacher, parents and persons responsible for the delivery of related services and includes cost analysis of the provision.

9. *Monitoring of the operation* is the function of parents, teacher and school supervisory personnel and includes evaluation of IEP implementation, its cost, and the degree to which short term objectives and annual goods are achieved.

10. *System review* calls forth procedures and schedules for providing review and modification of the IEP on an annual basis (Conference Report No. 94-664, pp. 30-31).

The ten basic stages that comprise the IEP system are set forth in flow chart form in Figure 1. Review of the chart serves to indicate the provisions for feedback, evaluation, decision making and revision that are contained in the system.

Efforts by LEA's to effect the implementation of IEPs for their handicapped students is expected to evoke concern regarding the quality of their endeavors. To meet the letter of the law requires performance which satisfies the minimal requirements of the regulations for Public Law 94-142. To meet the intent or spirit of the law requires procedures which exceed minimal criteria, procedure which measure the present quality of the LEAs implementation efforts. To ascertain an LEA's present level of implementation requires a rating system which goes beyond the typical "yes-no" dichotomous scoring and furnishes an auditing system which provides a continuum of criteria which range from non-delivery of a particular service to highly successful delivery. Within the IEP system defined marker events, i.e. events that are required for successful operation of the IEP system, make it possible to identify the precise location of a given child in the system. For each marker event an operational definition and criteria continuum will be provided for use in the assessment of the functional status of the event's occurrence. For example, within the system stage "Design and Specification of the Proposed Educational Program" the marker event "Determine Potential Areas for Programming" calls for use of assessment data in program planning for specific curriculum areas. A point scale criteria continuum is used to determine the degree to which the event occurs. The operational definition and criteria continuum for each of the 50 marker events contained in the IEP system are listed in Section III of the present document. Criteria for these Marker Events can be used by an LEA to audit their progress in implementation of the IEP system.

CHAPTER II: THE IEP SELF–AUDIT

One way to determine if an LEA is meeting P.L. 94-142 requirements is to conduct an audit of the IEP system as it functions within your school district or local setting. This self-audit could be much like that conducted by audit teams from state education agencies, with the obvious exception that you retain control of the audit at all times.

The view of IEP implementation in a school district as a system of interrelated marker events greatly facilitates the design and conduct of a self-audit. The fact that the system can be described and thus observed makes it possible to collect observations and make conclusions about the functioning of the IEP system. This procedure might be compared to attending a faculty meeting and mentally noting observations about what took place at the meeting. Afterwards one typically forms the conclusion that it was a good meeting but more emphasis should have been given to this or that particular issue. Similarly, the IEP

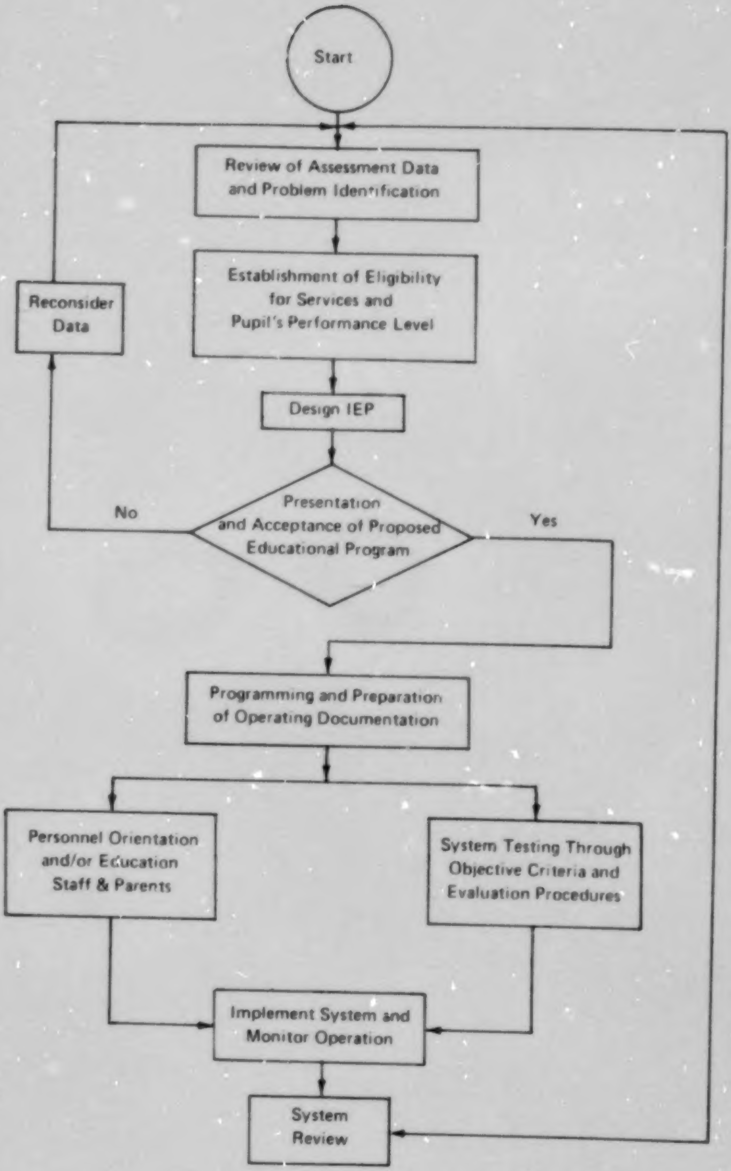
Start
Review of Assessment Data and Problem Identification
Establishment of Eligibility for Services and Pupil's Performance Level
Reconsider Data
Design IEP
No
Presentation and Acceptance of Proposed Educational Program
Yes
Programming and Preparation of Operating Documentation
Personnel Orientation and/or Education Staff & Parents
System Testing Through Objective Criteria and Evaluation Procedures
Implement System and Monitor Operation
System Review

FIGURE 1: SYSTEM FOR INDIVIDUALIZED EDUCATIONAL PROGRAMS

self-audit really is just a structured way of observing what takes place in the IEP system and then drawing conclusions about what is happening.

The overall purpose of the self-audit is to determine the status of marker events in the IEP system for special education students. The audit would observe or measure the absence or the qualitative presence of a given marker event for a given student. For example, the marker event, Specify Annual Goals, may be observed to have taken place for Mary Smith at a partially acceptable level and may not have been observed at all for Ronnie Harris.

The IEP self-audit can be designed by you to answer whatever questions you might have about IEP implementation. Thus, a self-audit could be conducted to determine if IEPs have been developed for students according to minimum guidelines of P.L. 94-142, or a self-audit could be conducted to identify problem areas in IEP implementation. By the same token, a self-audit could serve to highlight areas of outstanding IEP implementation and demonstrate implementation that is above and beyond the minimum requirements of P.L. 94-142.

The IEP self-audit can be a valuable tool for improving IEP implementation and for demonstrating responsible and accountable management. Today's school leadership calls for informed decision-making based on current and reliable information, and the IEP self-audit can provide such information. When the school superintendent asks how IEPs in special education are coming along, the results of a self-audit can be there to provide a ready and defensible response. When more specific questions about IEP implementation are asked, a special self-audit can be conducted to provide the answer. For example, IEP staff development needs of teachers or the completeness of IEP documents can be identified through a self-audit.

Results from the IEP self-audit then become a valuable information base for planning improvements in IEP implementation. The school administrator does not have to accept the status quo of IEP implementation but, instead, can use the self-audit as a tool to work toward the desired levels of IEP implementation. Another obvious benefit to conducting an IEP self-audit is that it allows time to prepare for an external audit. Any shortcomings identified by the self-audit can be addressed prior to being detected by external auditors. Internal self-audit results also can serve to validate external audit results or at least to provide information for comparison and perhaps more insightful interpretation.

The foregoing discussion assumes that any IEP self-audit conducted is reliable and valid. It would be easy to "hedge" on the results of a self-audit, but this would defeat the purpose and render the self-audit useless. The reliability and validity of the self-audit can be no better than the honesty and accuracy of the observations reported in the audit.

The IEP self-audit consists of the collection of observations made for all desired students on all desired marker events. There are three phases to designing and conducting the IEP self-audit. The first is the selection of marker events and children to be included in the self-audit, since the number of observations required for an audit must be realistic in terms of work hours. The second phase is the actual collection of audit data, and this includes determining the presence or absence of marker events and assigning a qualitative rating to observed events. The third and last phase is the task of scoring the audit in order to get a numeric score for the status of IEP implementation as described by the self-audit.

The ten basic stages in the IEP system are listed in Table 1. Additionally operational definitions and criteria continuum are supplied for each of the marker events contained in the ten stages.

TABLE 1

Marker Events Contained in the IEP System

Operational Definition	Criteria Continuum
Basic Stage 1 – Problem Identification	
*1. *Marker Event – Referral*	
Request for referral which is accepted by school.	0 – No referral 1 – Written request for referral 2 – Written referral omits one or more essential elements required to determine eligibility for service 3 – Written referral contains essential elements only 4 – Written referral reflects efficient documentation of problem(s) and intervention.
Basic Stage 2 – Analysis	
*2. *Marker Event – Evaluation Team*	
Evaluation team includes pupil's teacher, or a certified classroom teacher and at least one other person qualified to conduct diagnosis.	0 – No record of evaluation team 1 – Evaluation team not composed of required participants 2 – Evaluation team meets minimum participant requirement 3 – Evaluation team composed of required participants plus other representatives
3. *Marker Event – Signed Written Report of Evaluation*	
Written report of evaluation and conclusions is certified by members of evaluation team.	0 – No written report 1 – Written report is not signed 2 – Written report signed by some members of evaluation team 3 – Written report signed by all members of evaluation team

*Event is critical for minimal achievement of a requirement contained in P.L. 94-142.

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Stage 2 – continued	
*4. *Marker Event – Review of Assessment Data*	
Persons developing IEP review results of pupil's written evaluation to determine if: (1) criteria are specified which were used to determine eligibility for services; (2) evaluation data is organized into comprehensive statement of pupil's present performance levels.	0 – Non-delivery of service 1 – Evaluation does not contain required information 2 – Evaluation contains required information but failure to observe all procedures outlined in regulations 3 – Required information reported and procedures followed but minimal standards reflected in written report 4 – Information contained in written report reflects capable evaluation
Basic Stage 3 – Design and Specification of the Proposed Educational Program	
5. *Marker Event – Determine Potential Areas for Programming*	
Assessment data are used in planning program for specific curriculum areas.	0 – No data 1 – Assessment data not used to determine specific areas of strength and weakness 2 – Strengths and weaknesses determined but resulting data not related to specific curriculum areas 3 – Use of assessment data to relate pupil's present performance levels to specific curriculum areas
*6. *Marker Event – Specify Annual Goals*	
One or more written annual goals are derived from specification of skills a pupil can be expected to attain in a specific curricular area within the school year.	0 – Non-delivery 1 – Informal statement of annual goals 2 – Annual goals are documented, but do not reflect consideration of pupil's present performance levels or of curricular areas 3 – Annual goals define curricular areas and expected direction of change 4 – Realistic annual goals reflect desired articulation with assessment data and with curricular areas

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Stage 3 – continued	
7. *Marker Event – Articulate IEP Goals with District Goals*	
Annual Goals set forth in IEP are congruent with state (district) goals (e.g. annual goal for learning disabled student reflect priority objective of LEA, on-level reading).	0 – IEP goals reflect no consideration of state (district) goals 1 – IEP goals reflect consideration of state (district) goals, but areas of possible conflict exist 2 – IEP goals modified to avoid conflict with state (district) goals 3 – All IEP goals in accord with state (district) goals
*8. *Marker Event – Prioritize Annual Goals*	
Annual goals are prioritized in terms of critical need areas which reflects consideration of student's age, remaining school years, amount of learning attained and pupil response to previous teaching methods.	0 – No prioritizing 1 – Annual goals are prioritized without consideration of pertinent variables 2 – Annual goals reflect consideration of critical need areas but order of priority questionable 3 – Annual goals reflect consideration of students performance level but neglect consideration of other critical variables 4 – Annual goals reflect valid prioritizing of critical need areas
*9. *Marker Event – Document Annual Goal Personnel Requirements*	
IEP contains documentation of personnel who are responsible for attainment of each annual goal, and resources or materials required for goal attainment.	0 – No documentation 1 – Non specific statements on necessary personnel 2 – Partial documentation of personnel needed for attainment of annual goal 3 – Complete documentation of personnel needs but specific persons not named 4 – Complete documentation of required support and listing of specific person responsible for goal attainment.

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Stage 3 – continued	
*10. *Marker Event – Specify Short Term Objectives*	
Short term objectives serve as steps between child's present functioning level and goal child is expected to achieve by end of school year.	0 – Non-delivery 1 – Written record of one or more short term objectives for each annual goal 2 – Sequential listing of short term objectives to be achieved by pupil as he proceeds from present level of functioning to attainment of annual goal 3 – Realistic short term objectives are specifically stated in pupil terms, are measurable and observable and are valid link between present performance and annual goal
*11. *Marker Event – Short Term Objectives Stated in Measurable Terms*	
Short term objectives specify: (1) observable skills, (2) person who is to exhibit skill, (3) conditions under which skill is to be achieved and (4) what constitutes achievement.	0 – No Specification 1 – Objective addresses one element 2 – Objective addresses two or more elements 3 – Objective addresses each of four elements
*12. *Marker Event – Prioritize Short Term Objectives*	
Short term objectives are prioritized in terms of critical need areas.	0 – No prioritizing 1 – Prioritizing does not address pertinent variables 2 – Prioritizing addresses some critical need areas 3 – Prioritizing addresses all critical need areas, but order of prioritizing questionable 4 – Short term objectives reflect valid prioritizing of critical need areas

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Stage 3 – continued	
*13. *Marker Event – Lists Initial Instructional Activities*	
Individually appropriate activities are listed which serve to implement specific short term objectives.	0 – No listing 1 – General suggestion of activity 2 – Activities clearly stated and contain valid skill sequences 3 – Clearly stated sequential activities start with pupil's present functional level and provide experience necessary for attainment of short term objectives
*14. *Marker Event – Specification of Materials Required for Initial Activities*	
Itemized list is prepared of materials needed in activities	0 – No listing 1 – Description of activity contains reference to materials 2 – Partial listing and description of materials 3 – Listing and description of materials required in activities designed to implement specific short term objectives
*15. *Marker Event – Provide List of Support Services Needed for Goals/Objectives*	
Support services (e.g. transportation, nutritional) required for implementation of goals and objectives are listed along with frequency of delivery and context in which they are to be provided.	0 – No listing 1 – Partial listing 2 – Complete listing 3 – Complete listing accompanied by schedule and conditions of delivery

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Stage 3 – continued	
16. *Marker Event – Provide Cost Estimate of Implementation of Short Term Objectives and Annual Goals*	
Cost estimate for annual IEP implementation addresses services and materials.	0 – No reference 1 – Statement of cost consideration 2 – Computation of estimated dollar expenditure 3 – Computation of actual dollar expenditure
Basic Step 4 – Documentation of Presentation and Acceptance of Proposed Educational System	
17. *Marker Event – Required Participants Attend Meeting Held to Review IEP	
Meeting attended by an LEA representative, the child's teacher, parent or guardian, parent advocate or representative if requested by parent, and, when appropriate, the pupil for purpose of developing the pupil's individual educational program.	0 – No meeting held 1 – Meeting held without required participants 2 – All required participants attend 3 – Formally scheduled meeting attended by required persons and other professionals involved in developing the IEP
18. *Marker Event – Presentation and Review of Proposed IEP in Scheduled Meeting	
Analysis of assessment data, pupil's levels of functioning, proposed annual goals and short term objectives, and evaluation procedures are presented.	0 – No presentation of required IEP components 1 – Meeting agenda incomplete or inappropriate 2 – Assessment data and proposed program presented 3 – Meeting addresses integral parts of IEP

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 4 – continued	
19. *Marker Event – IEP Committee Acceptance of Specific Services Required for IEP*	
Listing is made of specific services required to implement pupil's IEP	1 – No listing 1 – Listing incomplete 2 – Listing complete 3 – Complete listing is feasible 4 – Listing is completely feasible and acceptable to IEP Committee
*20. *Marker Event – Placement Decision Made in IEP Review Meeting*	
During IEP Review Meeting placement decision is made which reflects pupil's specific service needs and least restrictive environment	0 – No placement statement 1 – No justification for placement decision 2 – Placement decision addresses only part of necessary components 3 – Placement decision reflects consideration of necessary components 4 – Placement decision addresses necessary components and is acceptable to participants at IEP meeting
*21. *Marker Event – IEP Records Extent of Pupil's Participation in Regular Education*	
Statement of extent to which pupil will participate in regular education addresses time, content, and peer group dimensions.	0 – No statement concerning participation in regular education 1 – General statement without dimensions 2 – Statement defines and addresses one or more dimensions 3 – Statement defines and addresses relevant dimensions
*22. *Marker Event – IEP Committee Assesses Individualization of IEP*	
Determine if pupil's goals and objectives are appropriate for individual needs.	0 – No individualization 1 – Partial concern for individual needs in IEP 2 – Consistent concern for individual needs 3 – Pupils individual needs are reflected in goals, objectives and activities

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 4 – continued	
*23. _Marker Event – Acceptance of Proposed IEP_	
Following presentation, review (and possible revision of proposed IEP each required participant at IEP planning meeting agrees in writing to its acceptance.	0 – No record of acceptance 1 – Record of acceptance by one or more participants 2 – Written acceptance of IEP by all participants
Basic Step 5 – Programming and Preparation of Operating Documentation	
*24. _Marker Event – Date Set for Service Initiation_	
Following acceptance of the IEP by the required participants at the presentation meeting, a date shall be set for the initiation of services listed in the IEP and the LEA shall be responsible for its observance.	0 – No date set 1 – Initiation date set but services not specified 2 – Initiation date set and services specified 3 – Dates set, services specified and person assigned responsibility for initiation
*25. _Marker Event – Statement of Anticipated Duration of Services_	
Statement of the anticipated duration of all service listed in the IEP.	0 – No statement of anticipated duration of service 1 – Proposed duration date supplied for some but not all services 2 – Proposed duration date listed for all services 3 – Rationale provided for duration date for all services
*26. _Marker Event – Generate Written IEP Statement_	
Recorded in required written form within one week after meeting	0 – No written IEP 1 – IEP partially recorded in writing 2 – Total IEP recorded in writing 3 – Total IEP recorded in required written form

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 5 – continued	
27. *Marker Event – Devise IEP Implementation Plan*	
Short term objectives which derive from annual goals are reviewed and implementation planned through activities in specified curriculum area(s).	0 – No implementation plan 1 – Lack of articulation between objectives and activities 2 – Implementation plan does not extend to all areas covered by annual goals and short term objectives 3 – Total articulation of implementation plans with goals and objectives contained in IEP
28. *Marker Event – Determine Cost of Formulating IEP*	
Prepare financial statement of person hours, intra-district travel and other services required for formulation of IEP which covers period extending from individual pupil assessment to implementation of IEP.	0 – No cost figures available 1 – Approximate estimate of general cost 2 – Cost accounting does not include all services required for IEP formulation 3 – Cost accounting provided for each specific service involved in IEP formulation.
Basic Step 6 – Education of Systems Delivery Personnel	
29. *Marker Event – Conduct Training Needs Assessment of IEP Service Staff*	
Assessment is made of training required by IEP service staff in order to achieve successful implementation of IEP.	0 – No needs assessment 1 – Training needs assessed informally 2 – Formal assessment of training needs which address pertinent areas 3 – Formal assessment of training needs responded to by all IEP Service Staff

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 6 – continued	
30. *Marker Event – Design IEP Staff Training Program*	
A staff training program is designed which reflects needs of IEP Service Staff.	1 – No staff training program 2 – Staff training program – not based on staff needs 3 – Partial relation between training and staff needs 4 – Staff training evolves from inventory of staff needs
31. *Marker Event – Staff Training Program*	
Staff training program described in terms of objectives, activities, scheduling, staff and evaluation.	0 – No written description 1 – Written description does not address required elements 2 – Written description addresses one or more elements 3 – Written description addresses all necessary elements
*32. *Marker Event – Implement Staff Training Program*	
Implementation of staff training follows guidelines set forth in training program.	0 – No implementation 1 – Implementation does not follow guidelines 2 – Implementation reflects marginal adherence to guidelines 3 – Implementation reflects full adherence to guidelines
33. *Marker Event – Determine Cost of IEP Staff Training Program*	
Cost of conducting staff training program is computed.	1 – No cost figures 2 – General estimate of cost 3 – Partial listing of cost figures 4 – Complete listing of cost figures

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 6 – continued	
34. Marker Event – Equip Parents to Utilize Techniques Required for Extension of IEP into After-School Activities	
Parents are trained in methods required for home extension of curriculum.	0 – No provision for parent training 1 – Inconsistent attempts at parent training 2 – Parent training partially based on needs assessment 3 – Parent training totally based on needs assessment
35. Marker Event – Parents Participate in Service Delivery	
Parents support delivery of services in home environment.	0 – No support from parents 1 – Marginal support from parents 2 – Parental support limited in time and/or effectiveness 3 – Effective parental support reflects expenditure in time 4 – Total parental support
36. Marker Event – Determine Cost Benefit of Parents' Contributed Assistance	
Cost effectiveness of parents' assistance derived from computation of value of parent's time contribution based on minimum wage.	0 – No cost analysis 1 – Estimated costs and gains 2 – Partial tabulation of costs 3 – Itemized accounting of costs
Basic Step 7 – System Testing	
**37. Marker Event – Specify Criteria for Monitoring Progress on Short Term (ST) Objectives*	
Criteria are designed for monitoring progress toward achievement of each short term objective.	0 – No monitoring 1 – Irrelevant criteria 2 – Relevant criteria provided for some but not all short term objectives 3 – Relevant criteria provided for all short term objectives

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 7 – continued	
*38. *Marker Event – Specify Procedures for Evaluating Progress on ST Objectives*	
Procedures are defined for application of criteria designed to evaluate progress on achievement of ST objectives.	0 – No listing of procedures 1 – Inappropriate procedures 2 – General procedures are listed 3 – Specific and appropriate procedures listed for evaluation of progress for each short term objective
39. *Marker Event – Schedule Provided for Monitoring Progress on ST Objectives*	
Statement of criteria and procedures to be used to evaluate progress on ST objectives accompanied by a schedule for monitoring.	0 – No schedule 1 – Monitoring schedule inappropriate 2 – Appropriate monitoring scheduled for some but not all ST objectives 3 – Appropriate monitoring scheduled for all ST objectives
40. *Marker Event – Assign Personnel for Monitoring Progress on ST Objectives*	
Personnel identified who will be responsible for monitoring progress on ST objectives and role defined in monitoring process.	0 – No assignment of personnel 1 – Personnel suggested but no formal assignment 2 – Person(s) assigned specific role in partial monitoring of progress 3 – Each phase of progress monitoring assigned to specific staff; role definition accompanies assignment
Basic Step 8 – Implementation	
*41. *Marker Event – Initiates IEP Implementation*	
Implementation of IEP follows guidelines and schedule indicated in plan.	0 – No implementation 1 – Disregard of plan and/or schedule in IEP implementation 2 – Limited adherence to plan and/or schedule in implementation 3 – Close adherence to both plan and schedule in IEP implementation

TABLE 1 (continued)

Operational Definition	**Criteria Continuum**
Basic Step 8 – continued	
42. *Marker Event – Determine Cost of IEP Implementation*	
Cost accounting applied to delivery of services called for in IEP.	0 – No accounting 1 – Approximate cost of services provided 2 – Partial accounting of charges encountered in delivery of IEP services 3 – Accurate cost analysis provided for delivery of IEP services
Basic Step 9 – Monitoring of the Operation	
43. *Marker Event – Evaluate IEP Implementation	
IEP implementation is evaluated in terms of frequency and length of services, utilization of service delivery staff, methods utilized in implementation and grouping of students for services.	0 – No implementation evaluation 1 – Global evaluation of implementation factors 2 – Evaluation of selected implementation factors 3 – Specific evaluation of all components of IEP implementation
44. *Marker Event – Delineate Person to be Responsible for Collection of Data from Monitoring of Progress*	
Person assigned to monitor progress on IEP implementation and to provide evaluative data on progress.	0 – No designation of personnel 1 – Personnel designated but no description of duties 2 – Personnel designated and duties described but no data collected 3 – Designated personnel provides data on monitoring of progress in implementation of IEP
45. *Marker Event – Review Progress Data	
Data on progress in implementation of IEP tabulating analyzed and reviewed.	0 – No review of data 1 – Limited review accorded selected aspects 2 – Acceptable review of selected aspects 3 – Acceptable review of all components of IEP implementation

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 9 – continued	
46. *Marker Event – Determine Cost of Collecting/Reviewing Progress Data*	
Cost accounting of procedures and services involved in collection and review of progress data.	0 – No cost determination 1 – Determination of approximate cost 2 – Cost computed for selected components 3 – Cost computed for all components involved in collection and review of progress data
Basic Step 10 – System Review	
*47. *Marker Event – Evaluate Progress in Achievement of ST Objectives and Annual Goals*	
With progress data as information base evaluation is made of progress in attainment of ST objectives and annual goals.	0 – No evaluation 1 – Evaluation not derived from review of data 2 – Data based evaluation of progress accomplished in selected areas 3 – Data based evaluation of progress accomplished for components involved in achievement of ST objectives and annual goals
48. *Marker Event – Assess Satisfaction with IEP*	
Ratings obtained from teacher and related staff, parent and pupil on satisfaction over planning implementation, evaluation, review and revision of IEP.	0 – No assessment of satisfaction 1 – Informal opinion survey 2 – Ratings on selected components obtained from some of personnel involved in IEP implementation 3 – Ratings on selected components obtained from all personnel involved in IEP 4 – Ratings on all components obtained from all personnel

TABLE 1 (continued)

Operational Definition	Criteria Continuum
Basic Step 10 – continued	
*49. *Marker Event – Review and Modification of IEP*	
Evaluation of progress in achievement of ST objectives and annual goals used as basis for review and revision of IEP.	0 – No review or modification 1 – Failure to achieve both review and modification 2 – Review and modification evolves in part from evaluation 3 – Review and modification based on evaluation of progress in achievement of IEP goals and objectives
50. *Marker Event – Determine Cost of IEP Review/Modification*	
Tabulate cost of IEP review and determine cost of modification.	0 – No determination of cost 1 – Estimate of approximate cost 2 – Cost computed on selected aspects 3 – Cost computed on all components of review and modification

CHAPTER IV: SELECTING THE AUDIT SAMPLE

The initial phase in designing and conducting an IEP self-audit is to select the sample of students and marker events to be included in the audit.

The Motivating Question

The very first step in selecting the audit sample is to identify the question motivating the particular audit for which the sample is being selected. This question usually can be isolated by asking yourself what it is you want to find out from the IEP self-audit. As one might imagine, there are many possible questions, and the following list presents some of these.

1. Is the district implementing all minimum P.L. 94-142 IEP requirements?
2. Is the district implementing those minimum P.L. 94-142 IEP requirements that pertain to the evaluating of student progress?
3. Do all IEP's contain annual goals, short term objectives, and documented support needed?
4. Is IEP implementation at optimum level for all visually handicapped students?
5. Is IEP implementation at optimum level for Mary Smith and Ronnie Harris?
6. Are IEP documents complete for racial minority students?
7. Is the extent regular classroom experience recorded in the IEP for all elementary school students.
8. Are IEP documents complete for speech students?
9. Are IEP documents complete for self-contained TMR students?

The information yielded by the above nine questions is quite varied. An IEP self-audit designed to answer question one would provide a ready answer to the general superintendent's question about how the IEP implementation is going. Questions two and three address more narrowly defined areas of IEP implementation, whereas question seven speaks to the very specific and isolated issue of documenting regular education experience in IEP implementation.

While questions one, two, and three do not specify any particular students for the self-audit, the remaining questions clearly designate selected student groups or even individual students for audit. Question four restricts the audit to visually handicapped students, and question seven restricts it to just elementary school students. The answer to question six could provide valuable assistance in responding to complaints of racial discrimination in IEP implementation.

All the questions are relevant to staff development in that they might reveal shortcomings in IEP implementation, and appropriate staff development could help eliminate these shortcomings. However, some questions could be used in combination to address specific areas in staff development. For example, the results of self-audits motivated by questions eight and nine could assist in comparing staff development needs of speech and TMR self-contained staff personnel. Such information would be helpful in budgeting scarce staff development resources.

The above list of questions is certainly not intended to include all the possible questions which might motivate an IEP self-audit, nor is the list intended to include questions of interest to all school districts. None of the above questions may be of interest in your particular school district, but probably one or more questions like the above could motivate an IEP self-audit in your district. In reality, the list of possible questions is limited only by your interest and ingenuity.

Some school districts may face the problem of having identified too many questions. It would be nice to know all the answers, but it may be impossible to conduct all the self-audits. In such cases, the school district must decide which questions are most important and conduct self-audits in order of importance, with the assumption that there is not sufficient time or money to answer all questions.

When considering motivating questions there is realization that the relative importance of questions can change from time to time. In September or October questions about overall district implementation according to minimum 94-142 IEP guidelines may be most important, and questions about specific IEP implementation facets (such as extent of regular classroom experience) may be more important in February. A question about optimal IEP implementation for Mary Smith could be critically important the day before a scheduled IEP review meeting with Mr. and Mrs. Smith, and notice of an impending investigation from the U.S. Office of Civil Rights could give priority to all IEP questions for racial minority students.

Identifying Marker Events

The second step in selecting the audit sample is to identify the marker events to be included in the IEP self-audit. If the question motivating the audit is clear in your own mind, and if you state the motivating question clearly, the specific marker events to be included in your self-audit should be fairly obvious. Example question one (listed previously) asked about meeting minimum requirements; hence the included marker events would be all those essential for minimum 94-142 IEP implementation. In the IEP system flow and the marker events listed in Table 1, there are 29 marker events that are essential for minimum 94-142 IEP implementation. In the table these events are marked with an asterisk.

Some motivating questions will include many marker events, and other questions will include only a few events. Example question three would include only the five marker events dealing with the specification of annual goals, short term objectives, and needed support. These are events numbered 6, 9, 10, 14, 15 in the IEP system.

Identifying Students

The third step is to identify the students to be included in the audit. As with marker events, if the motivating question is stated clearly, the students to be included will be obvious. Example question one would clearly imply all special education students, and example question four clearly specifies visually handicapped students. You may need to define the students even more precisely by modifying question four to read all special students whose primary, secondary, or tertiary handicap is visual.

Figure 2 gives the kinds of students and particular marker events included by each of the example questions presented earlier. The event numbers identify individual marker events listed in Table 1 for the IEP system. When preparing to conduct an IEP self-audit, you should write down the motivating question for the audit and the types of students and particular marker events included by the question (as done in Figure 2).

FIGURE 2: EXAMPLES OF MOTIVATING QUESTIONS

Motivating Question	*Types of Exceptional Students*	*Marker Event Numbers*
1. Is the district implementing all minimum P. L. 94-142 requirements?	All	1, 2, 4, 6, 8-15, 17, 18, 20-26, 32, 37, 38, 41, 43, 45, 47, 49
2. Is the district implementing those minimum P. L. 94-142 IEP requirements that pertain to the evaluation of student progress?	All	38, 39, 45, 47
3. Do all IEP's contain annual goals, short term objectives, and documentation of support needed?	All	6, 9, 10, 14, 15
4. Is IEP implementation at optimum level for all visually handicapped students?	Only visually handicapped	All Events

5. Is IEP implementation at optimum level for Mary Smith and Ronnie Harris?	Mary Smith Ronnie Harris	All Events
6. Are IEP documents complete for racial minority students?	Only special minority students	14, 15, 26
7. Is the extent of regular classroom experience recorded in the IEP for all elementary school students?	Only elementary school students	21
8. Are IEP documents complete for speech students?	Only students enrolled in speech therapy	14, 15, 26
9. Are IEP documents complete for self-contained TMR students?	Only TMR students enrolled in self-contained classes	14, 15, 26

Determining the Number of Observations

Once the marker events and students have been identified, it is time to compute the number of observations potentially required by the audit. The IEP system contains 50 marker events, and a given school district's special education student population might contain up to 30,000 students, depending on the size of the district. Even a moderately sized district might have 1,000 students enrolled in special education and it would be unrealistic to audit 50 marker events for 1,000 students. A little quick multiplication shows that an audit with even 500 special students would require 25,000 observations (500 x 50=25,000). Hence, it would be most unusual (though not impossible) to audit all students on all marker events.

A manageable number of observations required for any given audit can easily be attained by selecting a manageable number of students for the actual audit. For example, you might select 100 students for observation on 4 marker events, which would require only 400 observations. A different sample might select only 30 students for observation on 25 marker events. While the latter sample requires more observation, it would give a more complete view of the IEP system.

It is important to remember that the kind of observation involved in the IEP audit is not classroom behavior observation as might be construed in the sense of popular social interaction schemes, such as the Flanders. Rather, the self-audit observation involves only determination of whether or not a given marker event has taken place and assignment of a qualitative rating to observed events. Marker event observation or measurement primarily involves visual inspection of school records or personal witness of the event having occurred.

The number of observations required for a given audit can easily be found by multiplying the number of marker events times the number of students "eligible" for the audit. If a district were to have 6,000 special education students, the audit motivated by example question number one (Figure 2) would require 17,400 observations (29 x 6,000). Since actually conducting an audit requiring 17,400 observations is pretty unrealistic, you would want to reduce the number of required observations by selecting a smaller number of students for the audit.

If only 50 students were chosen from the 6000 "eligible" students, the number of required observations would only be 1,450 (29 events x 50 students), which is much more realistic. If 1,450 observations still seems unrealistic, reducing the number of students chosen from 50 to 25 results in only 725 required observations.

Unfortunately there is no clear way to determine how long a given audit will take to complete. Some marker events will naturally require longer to observe than others. Marker Event No. 6, Specify Annual Goals, would require only inspection of a written record to see if one or more annual goals exist as operationally defined in the IEP system (see Table 1), but Marker Event No. 22, Assess Individualization of IEP, could require much longer to observe. In order to be completely thorough in observing event No. 22, you might even have a panel of two or three professional staff members review the IEPs and student profiles to rate the extent of individualization. The latter procedure could be fairly time consuming. A quicker procedure would be for a single professional to judge the extent of individualization based on a superficial inspection of the IEPs and profiles.

Other factors affecting time required for an IEP audit would be the number of personnel available to work on the audit and the record keeping procedures of the school district. Six people working two days might complete an audit that would require one person fourteen days. If all IEP related records are filed accurately in one central location and are kept up to date, an audit will be accomplished much faster than it will if you have to spend valuable time hunting records.

Once you have determined the number of students to be included in the IEP self-audit, you are ready to select the actual individual students to be audited. Suppose that you have 682 students in your special education program and that you have decided to conduct an audit motivated by the first example question in Figure 2, "Is the district implementing all minimum P.L. 94-142 requirements?" Also, suppose that you think you have adequate time and personnel to include 30 students in your audit. Recall that this question requires observations on 29 different marker events. The audit then will require 30 times 29 events or a total of 870 observations.

The basic problem is how you should go about deciding which 30 of your 682 special students should be included in the IEP audit. Your goal is to select 30 students who will be representative of the total 682 students. In other words, the results of your audit based on these 30 students should not be much different than the results based on an audit including all 682 students (i.e. if someone were to take the time to conduct an audit of all 682 students).

It would be easy to select 30 students that would be misrepresentative of all 682 students. A natural tendency is to try to audit 30 of those students for whom you think there is good IEP implementation. While the results of this audit might appear very favorable, they would not be helpful to you in upgrading IEP implementation. The end product of having invested the time and energy to the audit would be only temporary feelings of warmth and satisfaction. These feelings are nice, but in this situation they could be very misleading.

The other side of the coin of misrepresentation is to try to select 30 students for whom you thought IEP implementation was especially poor. While you are not likely to select such students for a self-audit, you may have sometimes thought you experienced such misrepresentation in audits conducted by external agencies.

Sometimes people think that the best way to handle misrepresentation is to include a balance of both good and poor in the selection process. In our example, it might appear reasonable to select 15 students for whom we think IEP implementation is good and 15 for whom we think IEP implementation is poor. We might think that the good and poor implementation selected would cancel each other out to a happy medium, but there are at least two good reasons for avoiding this selection procedure. The first is that we probably don't really know which students have good and poor IEP implementation. If we knew for sure, why conduct an IEP audit?

A second reason for avoiding this procedure is that the extent of good and poor IEP implementation among all 682 students is probably not balanced out with 341 students (one-half of 682) having good IEP implementation and the remaining 341 having poor implementation. In fact, it would be impossible to know the actual numbers of students with good and poor IEP implementation (not to mention all the points in between good and poor) without having audited all 682 students. Therefore, if you select the 30 students in this manner, your audit will misrepresent IEP implementation in your total program, even though this procedure is initially appealing.

The preferred and best way to select the 30 students for your audit is to select them randomly, i.e., give each of the 682 students equal opportunity of being selected for the sample 30. You then have a random sample, and any misrepresentation included in your sample of 30 students is there because of some random condition, beyond anyone's control. Thus, there is no reason to expect results of an audit of 30 randomly selected students to be much different than results of an audit based on all 682 students. The random sample has the added advantage of being defensible in terms of statistics and of being the accepted way of selecting students when you wish to represent a large group.

The actual way to select a random sample is to use a table of random numbers, but such tables are usually found only in statistical text books. Using a random numbers table to select a sample is not overly complex but does require more explanation than space permits. However, if you wish to use a random numbers table for selecting your audit sample, see the readable presentation given by Kurtz (1965, pp. 81-83) or talk with a professional colleague who has experience in using such tables.

We will present an alternative sampling procedure which will give you a fair "random" sample. This sample will not be random (since a random numbers table is the only way to ensure a random sample), but your sample will be "random" in the sense that there is no reason to expect any systematic misrepresentation. That is, there is no reason to think your sample includes any particular students for any particular reason. We shall refer to a "random" sample generated by this alternative sampling procedure as a fair random sample.

The first thing to do in selecting a fair random sample of 30 students is to secure a master list of all of your 662 students in special education. If your student files are centrally located, you may already have a master list of students used for referencing individual record folders. If your student records are filed in subdistrict offices throughout your school district, you will need to build a master list by compiling student names from all the subdistrict locations. Also, remember to include students who may be enrolled in non-district sites such as those receiving contracted services in community agencies. Your student master list need not be in alphabetical order, but this may be most convenient. Be sure that no one student is listed more than once in your master list.

The next thing to do is to figure out what fraction of the student list will be included in the sample, and this involves a few simple calculations. Since you want a sample of 30 students, divide 30 by the total number of students in your master list.

1) 30 ÷ 682 = .044

Then multiply your answer by one hundred.

2) .044 x 100 = 4.4

Then round your answer *upward* to the next highest whole number.

3) 4.4 rounded upward = 5

Then make a fraction by placing your upward rounded answer over one hundred.

4) 5/100

Then divide both the numerator and denominator of this fraction by its numerator.

5) $\frac{5 \div 5}{100 \div 5} = \frac{1}{20}$

Then your answer of 1/20 shows that you will select one-twentieth of the master student list.

You can easily check the accuracy of your calculations by multiplying your calculated fraction times the total number of students in your master list.

check) 1/20 x 682 = 34.1

Then round your answer to the nearest whole number.

check) 34.1 rounded = 34

This rounded number should be the number of students you wanted in the sample or a few more than this number, which is 30 in our example. Hence, selecting one-twentieth of your master list of 682 students will give a sample including 34 students.

Now proceed through your master student list and check the name of every 20th student, since your calculated fraction was 1/20. When you finish, you will have checked the names of 34 students. Now you have a fair random sample of 34 students taken from your total group of 682 special education students.

Your initial audit called for a sample of 30 students rather than 34, so you can "randomly" delete the four extra students by omitting the first, last, and two middle students selected. You could also have someone think of four numbers between one and thirty-four, and then delete the selected students with those numbers. If one of the numbers thought of were fifteen, you would delete the fifteenth student selected and so forth. The important thing is to delete extra students in a way that does not systematically affect the representativeness of your fair random sample.

The above basic procedure for selecting a fair random sample can also be used when the master student list contains only student ID numbers and not names. If you already have a master list of student ID numbers (where no student number is duplicated), it is not necessary to create a master list of names. In such a case, a fair random sample of 30 ID numbers could be selected from the master list of ID numbers. These 30 ID numbers could be used to locate the names of the actual students included in the audit.

This procedure for selecting a fair random sample can be used for selecting any number of students from a student group of any size. If you wanted to conduct an audit motivated by example question four in Figure 2 (Is IEP implementation at optimum level for all visually handicapped students), the master list of students would contain only visually handicapped students. If this list contained 158 students and you wanted a sample of 20 students, you would select every eighth student from your master list. The following equations show the necessary calculations.

1) $20 \div 158 = .126$
2) $.126 \times 100 = 12.6$
3) 12.6 rounded upward = 13
4) 13/100
5) $\frac{13 \div 13}{100 \div 13} = \frac{1}{7.69} \doteq \frac{1}{8}$

check) $1/8 \times 158 = 19.75 \doteq 20$

Once the audit sample of individual students and necessary marker events is selected, the next step is the collection of observations on events for all sampled students.

CHAPTER V: COLLECTING AUDIT DATA

The second phase of an IEP self-audit is the actual collection of audit data. Data collection simply consists of selecting the desired point on the criteria continuum for each sampled marker event and sampled students. Criteria continua points always range from zero, which signifies the absence of the marker event, up to a maximum of four. Further progression along the continua implies a higher level of sophistication or quality in the occurence of the marker events.

Marker Event No. 6, Specify Annual Goals, can be taken as an example. The operational definition of event No. 6 is as follows (see Table 1):

> One or more written annual goals are derived from specifications of skills a pupil can be expected to attain in a specific curricular area within the school year.

The criteria continuum points for event No. 6 are as follows:

0 – Not addressed in IEP
1 – Informal statement of annual goals is included
2 – Annual goals are documented, but do not reflect consideration of pupil's present performance levels or of curricular areas.
3 – Annual goals define curriculum area and expected direction of change.
4 – Realistic annual goals reflect desired articulation with assessment data and with curricula areas.

Data collection for event No. 6 would call for a search for some record of written annual goals, as explained by the event's operational definition, and then for assigning a rating to that event (the written record); the rating could range from zero through four.

The general procedure to be followed in collecting audit data is to focus on the operational definition of the marker event and then to assign a rating to the implementation of that event as described by the criteria continuum. Table 1 gives complete operational definitions and criteria continua for all 50 marker events in the IEP system. The measurement or observation of the event usually will take the form of the visual inspection of a school record or by personal witness of the event having taken place.

Data collection will necessarily consist basically of a self-report from the school personnel most directly involved with each marker event. This implies that different personnel might collect data for different marker events and for different students. For example the educational diagnostician may be the most appropriate person for collecting data on Marker Events such as No. 6, Specify Annual Goals, and No. 10, Specify Short Term Objectives. On the other hand, the special education program director would likely be the person of choice to record observations for events No. 30, Design Staff IEP Training Program, or No. 42, Determine Cost of IEP.

In some cases the observation of the marker event will be clear cut and nonambiguous. If no record of written annual goals (event No. 6) can be found, then the event rating is unquestionably zero. At other times it may be difficult to decide on the correct criteria rating. In marker event No. 12 (prioritize short term objectives), an individual may be unable to decide whether or not the order of prioritizing is questionable or valid. The situation becomes more difficult when you consider two or three people attempting to agree on the validity of the prioritization.

The issue of stability in recorded observations also calls for serious consideration. The audit would obviously have little value if every Tom, Dick, and Harry (or Mary, Jane, and Sheila) were to come up with vastly different ratings. While criteria were designed to try to lead to consistent ratings, different people are bound to see and rate events differently. One helpful procedure is to use only people for data collection in whom you have confidence. A second helpful procedure is to "flag" those ratings which could go either way and have two or three people go back and rate the event again in order to gain a group concensus for the questionable ratings.

Another issue in data collection revolves around the simple logistics of how to collect 1,450 observations (assuming an audit of 29 marker events on 50 students) or whatever the number of observations may be. It is probably best to divide up the observations so that no one person ends up doing all the work. Ten staff members could reasonably collect 140 observations each within a week's time without complete interruption of normal working routine, whereas two staff members might require two weeks' time with total interruption of working routine.

CHAPTER VI: SCORING THE AUDIT

The following section describes procedures for scoring an IEP self-audit. Specifically, reasons are presented for scoring the audit, the kinds of possible scores are explained, and the computation of audit scores is discussed.

Reasons for Scoring the Audit

Probably the best reason for computing audit scores is to gain a summary of all the information. Since the audit will yield a string of numbers ranging from "0" to "4" for each student included in the audit, you will face the task of understanding and interpreting a large collection of numbers. Recall that a relatively small audit of only 20 students on 15 marker events would yield a collection of some 300 numbers. Audit scores provide a way of summarizing and communicating the audit results without having to study the entire pattern of all 300 numbers.

Audit scores also provide a baseline for comparing the results of one audit with results of another audit. You might wish to compare results from a September audit with results from a February audit to measure improvement in IEP implementation. It also may be important to compare audit results from racial minority students with those from Anglo students. Audit scores provide a way of making such comparisons, somewhat in the same context as comparing achievement scores of minority and Anglo students.

While the above comparisons between different audits may be useful in your district, it is important to note that the fair random sample may not be precisely representative of the student groups sampled. This makes comparison of different audits somewhat difficult, since some of the differences between audit results would likely be due to the lack of representativeness in the fair random samples (the use of random number tables in selecting samples does not eliminate this difficulty). The only way to avoid this problem is to select all students from the particular student groups involved.

An audit of racial minority students which included all minority students and an audit of Anglo students which included all Anglo students would be best for comparing IEP implementation in the two student groups. Both audits would necessarily represent both student groups precisely since there would be no students remaining for further audit. It is usually not feasible to include all students from a student group so a general rule of thumb for comparing audits is that each audit sample should include at least 50 percent of each group. When the audit samples contain less than 50 percent of the groups, you should use care when comparing results from different audits, especially when the differences between the results are relatively small.

One exception to the above situation is when a second audit is conducted with the same sample used in the first audit. You might conduct a September audit of 30 students and then a February audit of the same 30 students. In this situation, comparison of results between the two audits would be very meaningful since the comparison involves only one sample of students. Any difference between the results of the two audits would more likely be due to changes in IEP implementation.

Understanding the Score Matrix

The best way to organize and score the results of an audit is by means of a score matrix. A matrix is simply a square made up of horizontal rows and vertical columns which cross each other, very much like the old horizontal and vertical lines used to play tick-tack-toe. In the case of an IEP self-audit, the matrix rows contain observations for individual students, and the matrix columns contain observations for individual marker events.

A score matrix for a simple IEP audit involving only four students and three marker events would appear as follows:

	Marker Events		
	(No. 6) Specify Annual Goals	*(No. 10) Specify Short Term Objectives*	*(No. 26) Generate Written IEP Statement*
Baker, Henry	0	0	1
Johnson, Norma	2	3	1
Miller, Jean	0	3	1
Potter, Mathew	1	2	2

The above audit resulted in 12 observations, and these 12 observations are recorded in the score matrix. Observations from any audit should be recorded in such a matrix. We see that events numbered 6 and 10 did not take place for Baker, since the observations were zero for both events. However, the event numbered 26 did take place for Baker and the quality rating for the event's occurrence was one. Similarly, the observations for Johnson on marker events numbered 6, 10, and 26 were reportedly 2, 3, and 1. Inspection of the matrix shows that IEP implementation was most complete for Johnson and next most complete for Potter.

A few additions to the example score matrix given above will show the kinds of scores possible from an audit. Consider the following additions to the score matrix:

	Marker Events			Student Scores	
	(No. 6) Specify Annual Goals	*(No. 10) Specify Short Term Objectives*	*(No. 26) Generate Written IEP Statement*	*Minimal*	*Optimal*
Maximum possible rating	-4-	-3-	-3-		
Baker, Henry	0	0	1	1	1
Johnson, Norma	2	3	1	3	6
Miller, Jean	0	3	1	2	4
Potter, Mathew	1	2	2	3	5
Minimal	2	3	4	9	
Event Scores					
Optimal	3	8	5		1

Inspection of the above matrix readily reveals that there are several scores possible from an IEP audit. These include minimal and optimal scores for both students and marker events. The two right-most *columns* of the score matrix contain *student* scores and show that the minimal score for Miller is 2, and the optimal score for Miller is 4. The two bottom *rows* of the matrix contain Marker Event scores and show that the minimal score for the event, Specify Annual Goals, is 2, and the optimal score for the same event is 3.

The following illustration shows how to compute each of these four scores:

1) Minimal student score
The minimal student score is computed by simply counting up all the non-zero observations in a given row. Baker's minimal score is 1 because his observations were non-zero on one of the three marker events. Johnson's minimal score is 3 because the observations on all three marker events were greater than zero. The student's minimal score can be used to find the completeness of minimal implementation for a given student by dividing the minimal score by the number of essential marker events in the audit. For example, Baker has minimum implementation on about 33 percent of audited marker events (one divided by three), while Johnson and Potter have 100 percent minimum implementation in the three events.

The following shows minimal student score computation (NZ stands for a non-zero observation):

Baker Minimal student score = 0 + 0 + NZ = 1

Johnson Minimal student score = NZ + NZ + NZ = 3

The percent of minimum IEP implementation for individual students can be easily computed by dividing the student minimal score by the number of essential marker events (i.e., essential for IEP minimum implementation.

Baker $\frac{\text{Minimal score}}{\text{number of events}} = 1/3 = 33.3$ percent

Johnson $\frac{\text{Minimal score}}{\text{number of events}} = 1/3 = 100.0$ percent

Potter $\frac{\text{minimal score}}{\text{number of events}} = 3/3 = 100.0$ percent

2)Optimal student score

The optimal student score is computed by adding up all the observations for a given student. Baker's optimal score is 1, since 0 plus 0 plus 1 equals 1; and Johnson's optimal score is 6, since 2 plus 3 plus 1 equals 6.

Since the optimal score is based on the quality ratings on the criteria continuum collected in the marker event observations, the optimal score can also be used to express the percent of potential quality observed in the IEP system. Dividing a student's optimal score by the sum of the maximum possible ratings of audited marker events gives the percent of potential quality for the student. In the above example, the sum of the maximum possible ratings for all three marker events is 4 plus 3 plus 3, which equals 1 Thus, the percent of potential quality for Baker is 1 divided by 10, which equals 10 percent, and the percent of potential quality for Johnson is 6 divided by 10 which equals 60 percent.

The following shows optimal student score computations:

Baker optimal student score = 0 + 0 + 1 = 1

Johnson optimal student score = 2 + 3 + 1 = 6

The percent of potential quality observed in the IEP system for a given student can be computed by dividing the optimal student score by the sum of the maximum possible ratings.

Baker $\frac{\text{optimal score}}{\text{maximum ratings}} = \frac{1}{4+3+3} = \frac{1}{10} = 10.0$ percent

Johnson $\frac{\text{optimal score}}{\text{maximum ratings}} = \frac{6}{4+3+3} = \frac{6}{10} = 60.0$ percent

3)Minimal marker event score

The procedures used in computing marker event scores are essentially the same as those used in student scores. The minimal score for a given marker event is the count of all non-zero observations for the event. The minimal score for the event Specify Annual Goals is 2, since there are non-zero observations for two of the four students (the two students are Johnson and Potter). The optimal score for the event Generate Written IEP Statement is 4, since all four students have observations greater than zero.

A measure of the extent of minimal implementation on the event, Specify Annual Goals, can be obtained by dividing the event's minimal score by the number of students in the audit. Thus, the percent of minimal implementation on this event is 2 divided by 4, which gives 50 percent. Likewise, the extent of minimal implementation is 75 and 100 percent for the other marker events.

The following shows minimal marker event score computations (NZ stands for a non-zero observation):

SPECIFY ANNUAL GOALS 0 + NZ + 0 + NZ = 2
GENERATE WRITTEN IEP STATEMENT NZ + NZ + NZ + NZ = 4

A measure of minimal implementation for a single marker event is given by the percent of students who have minimum IEP implementation on the given event. This percent is easily computed by dividing the minimal marker event score by the number of students in the audit.

SPECIFY ANNUAL GOALS $\frac{\text{minimal event score}}{\text{number of students}} = \frac{2}{4} = 50.0\%$

SPECIFY SHORT TERM OBJECTIVES $\frac{\text{minimal event score}}{\text{number of students}} = \frac{3}{4} = 75.0\%$

GENERATE WRITTEN $\frac{\text{minimal event score}}{\text{number of students}} = \frac{4}{4} = 100.0\%$

4) Optimal marker event score

The optimal score for a marker event is computed by adding up all the observations. The optimal score for Specify Short Term Objectives is 8, since 0 plus 3 plus 3 plus 2 equals 8. The percent of potential quality for a given event can be computed by dividing its optimal score by the product of its maximum possible rating times the number of students audited. The percent of potential quality for the event Specify Short Term Objectives is 8 divided by the product of 3 (maximum possible rating) times 4 (students), which gives about 67 percent. The percent of potential quality for the event Specify Annual Goals is about 19 percent (3 divided by 16).

The following shows optimal marker event score computations:

SPECIFY SHORT TERM OBJECTIVES $0 + 3 + 3 + 2 = 8$

GENERATE WRITTEN IEP STATEMENT $1 + 1 + 1 + 2 = 5$

The percent of potential quality for a given event provides an indication of how far along current implementation is toward achieving ideal or maximum implementation. This percent is computed by dividing the optimal marker event score by the product of the event's maximum possible rating times the number of students.

SPECIFY ANNUAL GOALS

$$\frac{\text{optimal event score}}{\text{maximum possible rating} \times \text{number of students}} = \frac{3}{4 \times 4} = \frac{3}{16} = 19.0\%$$

SPECIFY SHORT TERM OBJECTIVES

$$\frac{\text{optimal event score}}{\text{maximum possible rating} \times \text{number of students}} \quad \frac{8}{3 \times 4} = \frac{8}{12} = 67.0\%$$

GENERATE WRITTEN IEP STATEMENT

$$\frac{\text{optimal event score}}{\text{maximum possible rating} \times \text{number of students}} \quad \frac{5}{3 \times 4} = \frac{5}{12} = 42.0\%$$

Perhaps at this point it would be helpful to examine a more realistic looking score matrix. Figure 3 presents a score matrix from a hypothetical audit involving a sample of 10 students with observations collected on 29 marker events. This hypothetical matrix can help explain how to use scores and the information contained in the score matrix. The student and event scores have been computed and are presented in Figure 3. The scoring procedures described in the foregoing discussion were used in computing these scores.

In the interest of simplicity, the student scores from Figure 3 have been listed for each student in Table 2. The columns of most interest in Table 2 are the ones headed *Percent Minimum IEP Implementation* and the one headed *Percent of Potential Quality.* The percent minimum IEP implementation shows that there was at least two-thirds implementation (68 percent) for all students, but that

	Review of Assessment Data	Specify Annual Goals	Prioritize Annual Goals	Document Annual Goal Personnel Requirements	Specify Short Term Objectives	S. T. Objectives in Measurable Terms	Prioritize Short Term Objectives	List Initial Instructional Activities	Specification of Materials	List of Support Services	Required Participants Attend	Presentation and Review of IEP	Placement Decision	Extent of Regular Ed. Participation	Assess Individualization	Acceptance of Proposed IEP	Date for Service Initiation	State Anticipated Duration	Written IEP Form	Student Scores	
Event Number	4	6	8	9	10	11	12	13	14	15	17	18	20	21	22	23	24	25	26	Minimal	Optimal
Maximum Possible Rating	(4)	(4)	(4)	(4)	(3)	(3)	(4)	(3)	(3)	(3)	(3)	(3)	(4)	(3)	(3)	(2)	(3)	(3)	(3)		
Student																					
A	1	4	0	1	3	2	0	0	0	0	2	2	2	1	1	0	1	1	1	13	22
B	2	4	1	1	3	3	0	1	0	0	3	3	4	3	3	2	0	0	2	14	35
C	4	3	0	2	3	3	0	3	3	3	2	3	4	3	3	2	0	0	2	15	43
D	3	4	0	0	3	3	1	2	1	1	2	3	4	0	2	2	0	0	3	14	34
E	4	3	2	1	3	2	0	3	2	1	3	3	4	3	3	2	1	2	2	18	44
F	4	3	0	0	2	3	0	0	1	1	3	3	4	2	3	2	0	0	2	13	33
G	1	4	2	2	3	2	0	3	0	1	3	3	4	3	3	2	0	0	2	15	38
H	3	4	0	0	2	2	0	1	0	1	2	2	2	1	2	1	0	0	1	13	24
I	4	4	0	0	2	3	1	1	1	0	3	3	2	3	3	2	0	0	1	14	33
J	4	3	1	0	3	3	0	0	0	1	3	2	4	1	3	2	0	0	3	13	33
Minimal	10	10	4	5	10	10	2	7	5	7	10	10	10	9	10	9	2	2	10	142	
Event Scores																					
Optimal	30	36	6	7	27	26	2	14	8	9	26	27	34	20	26	17	2	3	19		339

FIGURE 3: SCORE MATRIX FROM A HYPOTHETICAL IEP AUDIT

there was not total minimum implementation for any student. The percent of potential quality ranged from 35 to 71 percent and shows only moderate implementation relative to the maximum possible on the 29 events observed. The very low percents for students A and H may suggest unique IEP implementation problems for these two students.

TABLE 2
Student Scores From Hypothetical Audit

Student	*Student Minimal Score*	*Percent Minimum IEP Implementation*[1]	*Student Optimal Score*	*Percent of Potential Quality*[2]
A	13	68	22	35
B	14	74	35	56
C	15	79	43	69
D	14	74	34	55
E	18	95	44	71
F	13	68	33	53
G	15	79	38	61
H	13	68	24	39
I	14	74	33	53
J	13	68	33	53

[1] Student minimal score divided by 19 (number of events).

[2] Student optimal score divided by 62 (sum of maximum possible ratings).

The information contained in Marker Event scores may be more useful than the student's scores since the IEP system status in terms of specific marker events is likely to be more critical than is knowledge of a specific student. Table 3 presents marker event scores from the same hypothetical audit. The percent minimum implementation in Table 3 shows that there was 100 percent minimum implementation on nine of the twenty-nine events observed . There was an extremely low level of implementation for events No. 12, Prioritize Short

Term Objectives, No. 24, Date Set for Service Initiation, and No. 25, Statement of Anticipated Duration of Services. These three events would point to serious problems in IEP implementation.

TABLE 3

Marker Event Scores From Hypothetical Audit

Marker Event	*Minimal Event Score*	*Percent Minimum Implementation*[1]	*Optimal Event Score*	*Percent Potential Quality*[2]
4	10	100	30	75
6	10	100	36	90
8	4	40	6	15
9	5	50	7	18
10	10	100	27	90
11	10	100	26	87
12	2	20	2	5
13	7	70	14	47
14	5	50	8	27
15	7	70	9	30
17	10	100	26	87
18	10	100	27	90
20	10	100	34	85
21	9	90	20	67
22	10	100	26	87
23	9	90	17	85
24	2	20	2	7
25	2	20	3	10
26	10	100	19	63

[1] Minimal event score divided by 10 (number of students).

[2] Optimal event score divided by the product of 10 times the maximum possible rating.

The percent of potential quality reported in Table 3 varies widely. Events numbered 15, List of Support Services, and 26, Written IEP Form, reveal an interesting pattern. Note that there is 100 percent minimum implementation for event No. 26, but only 63 percent potential quality of implementation. For event No. 15, there is 70 percent minimum implementation, but only 30 percent potential quality. The large discrepancy between the two percent figures shows that there is some room for improvement in the listing of support services and writing of IEP forms, even though there is a good minimum level of IEP implementation for these two events.

CHAPTER VII: SYSTEM REMEDIATION AND FOLLOW–UP

To determine if all component parts of a system are functioning effectively requires a review of the total system; the review provides data upon which remediation or revision can be based. After the indicated remediation or revision is implemented there is need for a subsequent review in order to measure the effect of these alterations on the total system. Thus, each LEA should carry out an evaluation or self-audit of their IEP system. How frequently the audit should be accomplished is determined by a variety of factors. During the initial stages of implementation, constant or continuing review generally is required in order to achieve balanced functioning. After a desired efficiency is obtained, the interval between reviews can be extended and in some instances less comprehensive reviews can be effected when the evaluation of specific components is desired. After the "phasing-in" period has transpired,the total IEP system (which includes the ten basic steps set forth in Section III) should receive a complete audit at least annually, with semi-annual or quarterly evaluation being preferred, at least on a partial basis. Each LEA will have to determine the scope and frequency of IEP audits appropriate for their particular setting.

When documentation of deficits and strengths in the provision of IEP is achieved, strengths should be analyzed as well as deficits. Knowledge of the events which lead to successful performance frequently can be useful in attempts to remediate poor performance. Thus, if focus is on deficit areas only, the components of failure, but not of success, are analyzed, and the full benefit of an IEP audit are not realized.

Admittedly, it is the deficit areas that necessitate revision, therefore, the documentation of a deficit should be followed by recommendation of methods to be used to alleviate the condition. If an audit of ten marker events provides data which indicate desired functioning in six but marginal or unacceptable functioning in the remaining four marker events, there should be review of the procedures used in the accomplishment of each of the ten marker events in order to analyze both the successful and unsuccessful procedures. Following this analysis, attention should center on recommended revision or remediation of the deficit areas. For example, for Marker Event No. 8, Prioritize Annual Goals, a rating of two indicates that annual goals reflect consideration of such need areas as student's age, remaining school years, amount of learning attained and pupil response to previous teaching methods. Analysis of the rating could serve to indicate a need for additional staff training which would include demonstration and supervised experience in prioritizing annual goals.

Following the provision of these experiences, IEP's formulated by persons who participated in the training would be reviewed and the criteria continuum for that event again would be used to determine if valid prioritizing of annual goals occured. If so, this particular event would not require additional training emphasis, but as a part of the total system, it should continue to be audited periodically. If, however, after training and supervised experiences the prioritizing continues to lack validity, the content and method of training should be analyzed, as should the input from each IEP committee member in the prioritizing procedure. When the condition responsible for the current invalid prioritizing is identified, remediation again would be planned and implemented and subsequent functioning of the committee members in this area would be evaluated.

In another case, an IEP self-audit might serve to indicate that Marker Event No. 26, Generate Written IEP Statement, had a rating of "0-No Written IEP." Analysis should reveal if a written IEP was drafted during the committee meeting. If it were not, the reason for the neglect should be determined; should lack of expertise be the reason, subsequent staff training would include discussion, observational examples and supervised experience in recording the IEP in writing. If follow-up efforts provide proof that written IEPs were drafted, but that lack of secretarial staff prevented the accomplishment of the final form within one week after the meeting, then the workload of the secretarial staff should be reviewed. In either case the Marker Event should be monitored after the remediation or revision is accomplished, and an audit of that specific event should occur shortly after the remediation is implemented. If this audit provides data which indicates successful criterion performance, then subsequent audits may exclude this event.

The results of IEP audits give LEA administrators the opportunity to identify both those procedures which need revision and those which are nonfunctional. By the same token, the administrator can capitalize on the awareness of successful procedures and perhaps modify or adapt these to problem areas needing remediation in IEP implementation. It is through this process of enlightened decision-making that the LEA administrator becomes accountable, and the IEP self-audit is a major step toward obtaining the information necessary for enlightened decision.

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SECTION II

Education Theory and Evaluation Criteria for Individualized Education Programs

Richard P. Iano

IANO, RICHARD P. Dr. Iano is presently Professor of Special Education at Temple University in Philadelphia, Pennsylvania. He received his Doctorate of Education in Special Education from Syracuse University in 1968. In conjunction with Dr. Diane Bryan, also of the Department of Special Education at Temple University, Dr. Iano developed a model program entitled *Inservice Training of Regular Education Teachers and Parents* as a component of the Special Education Department's application for a program assistance grant. He has published numerous articles for such special education journals as *Exceptional Children* and the *Journal of Special Education.* Dr. Iano also serves as consultant to the Southeast Regional Learning Center in Montgomery, Alabama where he is actively involved in the development of guidelines and evaluation instruments for individualized Education Programs.

INTRODUCTION

The IEP provision of P.L. 94-142 is considered an essential component in meeting the goal of insuring that handicapped children have a free, appropriate public education and full educational opportunity.

There are two kinds of criteria presented in this paper. First, there are criteria for evaluating the quality of IEP documents themselves. The second kind of criteria are evaluating the procedures LEAs have established for developing, reviewing, and revising IEPs.

As a basis for the criteria proposed in this paper for determining the progress of LEAs toward implementing IEPs, an educational rationale is provided. The rationale is drawn in part from the educational theory of John Dewey and in part from the more recent works of certain philosophers and psychologists. The views on human nature and knowledge which these philosophers and psychologists propose have striking implications for education and they are a strong challenge to the views which have dominated education during this century.

A major thesis of this paper is that deep-seated psychological and philosophical belief-systems form the basis for educational practices and ideas, often in a covert manner. Therefore, foundational belief-systems are given detailed attention as a preparation for considering IEP criteria. Two such belief-systems are examined here. One system is the more familiar of the two and is widely accepted among educators. The other belief-system has only recently begun to emerge in psychology and philosophy and it is less well known to educators. It is the latter, emerging system which is advocated in this paper and which forms the basis for the IEP criteria proposed.

The IEP criteria proposed can be fully understood only within the context of the two contrasting belief-systems. The first and widely accepted system is believed by the author to impose severe restrictions on educational practices while the second system is believed to offer liberating consequences for education. To prepare the reader for the IEP criteria developed, then, the two belief-systems are first examined in some considerable detail. Following the examination of each belief-system, its implications for educational practices and IEPs are described. The final sections of the paper present the IEP criteria. The two belief-systems are briefly overviewed in the next section.

OVERVIEW: TWO BELIEF - SYSTEMS

Much of educational thought during this century has been dominated by such ideas as, that we should strive for precision, objectivity, and scientifically grounded knowledge and that educational practices should be validated and standardized. These ideas have powerfully influenced theory, method, and research in education. The sources for these ideas can be traced to developments in twentieth-century philosophy and psychology. From the early part of this century until about the Second World War, American philosophy was captured by a movement and belief-system which denigrated traditional speculation and exalted science and its works (Aibagnano, 1967; Blanshard, 1973; Hamlyn, 1967; Kolakowski, 1968; Radnitsky, 1973). For the purposes of this paper, the movement will be called positivist-empiricist (PE). This same PE established itself in American psychology, combining with and supporting the growth of behaviorism and S-R psychology (Blanshard, 1973; Chein, 1972; Radnitsky, 1973; Taylor, 1967).

The restrictive and almost total grip of PE on philosophy has weakened considerably since the Second World War (Blanshard, 1973; Radnitzky, 1973) and psychology has recently also begun to emancipate itself (Chein, 1972; Rychlak, 1977; Wann, 1964). Although education continues to be dominated by the PE belief-system, the alternative system which has begun to emerge in psychology and philosophy can now be discerned with some clarity, as can its implications for education. One major task of this paper is to draw out the educational and corresponding IEP implications of the newly emerging belief-system.

As will subsequently become apparent, the belief-systems have widely divergent consequences for educational practices and also, of course, for developing, implementing, and evaluating IEPs. The PE belief-system and its consequences are first reviewed, and then the emerging system which challenges the more firmly established PE system.

CHAPTER I: THE POSITIVIST - EMPIRICIST

The Major Principles of PE

This is a selective review of PE, in that only those principles are included which seem to have most significantly affected educational theory and practice. The principles are as follows:

1. Only what is scientifically validated can count as real knowledge. It is only through science and its methods that we can achieve true and reliable knowledge.

2. Science is primarily its methodology. Imaginative speculation and theorizing are at best subsidiary.

3. Only that which is explicit and precise can count as knowledge. Precision and explicitness are often equated with meaningfulness; that which is vague or ambiguous lacks meaning and significance and so may safely be ignored.

4. The world is essentially deterministic and mechanistically governed by efficient-causes. Every event must necessarily be the outcome of one or more prior, specific causes.

5. A prime method for achieving knowledge and understanding is through reductive analysis. Higher-order and more complex phenomena may be fully accounted for and explained through lower-order and simpler sub-components; "wholes" are studied and understood by reductive analysis into their "parts."

6. The ultimate source and authority for all of our knowledge is empirical and often even sensory. All of our concepts, judgments, theories, speculations, and imaginings must derive from and rest upon our immediate experiences.

7. The major purpose for pursuing knowledge is to achieve prediction and control in the world. Explanation and understanding are never pursued as ends in themselves but are, instead, valued for their contribution to achieving prediction and control.

8. Values are arrived at without rationality and they are arbitrary. Values are ultimately reducible to our passions, preferences, and arbitrary likes and dislikes.

9. These, then, are the principles of PE that have emerged out of twentieth-century philosophy and psychology. And they are the principles that have defined the character of much of educational theory and practice. We turn now to PE consequences for educational methodology.

The Influence of PE on Educational Methodology

PE has inspired a family of educational methodologies, including programmed learning, individually prescribed instruction, behavior modification systems, precision teaching, and most models of diagnostic-prescriptive teaching. These methodologies hold certain basic features in common, typing them all to PE. There are five such features: (1) they are prescriptive, (2) teaching always begins with the development of precisely defined objectives, (3) learning activities and program content are broken down into small units, (4) motivation is viewed as externally manipulable, and (5) evaluation of instruction and learning is almost exclusively in terms of outcomes. Next, each of these features is discussed in turn.

Prescriptiveness

First, PE programs are prescriptive, they are planned, written, and developed beforehand. This means that the teacher or program planner takes the initiative and major responsibility for directing and developing the program. The learner's role is primarily a reactive and passive one; he reacts and responds to the planner's initiatives and objectives. This prescriptive feature reveals a reliance on PE principles of determinism, prediction and control, and empiricism. The empirical principle of PE asserts that the source of all learning, knowledge, and growth is immediate, environmental experience. PE mechanistic determinism entails the notion that all learning and growth has specific environmental causes. These environmental causes of learning can be manipulated and controlled, so that the teacher's major role is one of becoming a primary causative agent of learning in the student's environment.

Furthermore, to fully achieve predictive power and control over the educational process one must be able to standardize and validate principles and practices. But standardization and validation depends upon the ability to prescriptively plan. Only if the teacher controls the program, only if he can prescribe and direct it, can he expect to be able to repeat the same program again and again in a standardized manner so that it can be validated and then repeated over again at will.

It might at first appear that the popular approaches to diagnostic teaching escape being prescriptive since the teacher does not commit himself to any particular program direction until the student has been diagnosed. However, most of the current approaches to diagnostic teaching actually fit well into the prescriptive model. Their prescriptive character shows up with clarity once it is noticed that these diagnostic teaching approaches generally lay out the *areas* to be diagnosed well in advance. This is so even if the teacher uses a variety of instruments or models to guide the diagnosis. These predetermined diagnostic areas, in turn, determine what the student's problem will look like and, ultimately, the shape of his remedial program. It is justifiable, then, to generally label these approaches as *diagnostic-prescriptive.*

Similarly, just because these prescriptive methods allow for mid-program shifts and changes does not alter the fact that they are prescriptive. The point is, whether at the start of the program or somewhere in its mid-stream, in prescriptive teaching the teacher takes the major initiative and responsibility for developing and directing the student's program.

Precisely Defined Objectives

A second feature of PE methodologies is that teaching, or planning for teaching, always begins with precisely defined and specified objectives. This feature satisfies the PE principle that only what is explicit and precise can count as knowledge and as being meaningful. The assumption is that if one cannot precisely state his objectives, then he cannot know where he is headed or what he wants to accomplish. And if one does not know what he wants to accomplish or where he is headed, then he cannot know what it is he wants to do from moment to moment — any activities he engages in would have to be random and arbitrary, or, at best, based on guesswork. Therefore, the only rational and intelligent basis for engaging in any activity, including that of teaching, is to know precisely what it is one wants to accomplish and to have clearly defined objectives. It is obvious that this feature leaves no room for vagueness or ambiguity, for being impelled by purposes that are not yet clearly seen, or for the emergence of unexpected and unpredicted purposes.

The practice of specifying objectives at the start of teaching is, of course, part of being prescriptive in teaching. The practice assumes that learning is environmentally controlled, it places the learner in a primarily passive and reactive role, and it assumes a high degree of ability on the part of the teacher to predict and control the learning and growth of the student.

Analysis Into Small Units

A third feature of these methodologies is that they tend to break down both learning and teaching activities into small units and steps with the idea that, as compared with larger wholes, smaller units are more easily comprehended, controlled and manipulated, and learned. Programmed learning exemplifies this feature, especially the type of programming that attempts to reduce learning tasks into such small steps that the learner can independently master them and proceed to the next higher tasks in the sequence. Similarly, a major strategy of behavior modification methods is to first analyze what is to be learned into very small components and then to precisely reinforce the learner in an attempt to lead him toward the achievement of larger concepts, skills, behavior dispositions, etc. Analyzing learning tasks into small components has even acquired a name: it is called task analysis.

The analysis of activities into smaller components corresponds to the PE principle of reductionism. Reductive analysis assumes that higher-level, complex ideas or tasks may be fully accounted for through lower-level, simple ones. It is assumed that nothing is lost in meaning or significance when tasks are reduced to their sub-components. Thus, through mastery of smaller and prerequisite units, the learner can eventually achieve mastery of comprehensive wholes. Here, reductionism combines with the deterministic principle of PE. That is, comprehensive wholes are fully accounted for and determined by specific, sub-components. The most efficient way to achieve an understanding of higher-level ideas, or to master a complex skill, or to achieve a comprehensive purpose is to master the components that specifically determine and account for those wholes.

Of course, this reductionist approach also supports the strategy of precisely defining objectives, since wholistic, broad-ranging, and higher-level objectives may, without fear of losing their meaning or significance, be reduced to more specific and precisely defined objectives.

External Manipulation of Motivation

A fourth feature of PE methodology is in its treatment of student motivation. Motivation is seen as essentially environmentally and externally determined. The student's motives are to be directed and manipulated in the service of the teacher's or program's objectives. This feature is most clearly exemplified in the way behavior modification methods typically use reinforcement techniques as their major, if not exclusive, means of directing and motivating the student toward preconceived program objectives. This approach is not only a consequence of a mechanistic determinism, but nicely lends support to the notion of prescriptive teaching, since if the student's motives are easily manipulated from the outside, then he can easily be directed toward preconceived ends.

Outcomes Evaluation

The fifth and final feature of PE to be reviewed here is that evaluation of instruction and programs is carried out almost exclusively in terms of their outcomes. This type of evaluation fits well with prescriptive strategies and deterministic principles. If instruction is prescriptive, with objectives or outcomes precisely defined beforehand, then it would seem most obvious and natural to evaluate instruction or learning by determining how well the preconceived objectives have been met. Furthermore, a mechanistic determinism proposes that learning outcomes can be produced by the manipulation and control of specific, antecedent conditions. Again, it seems to naturally follow that the efficiency and success of those manipulations (i.e., the methods and techniques used) would be evaluated by the outcomes they produce. The consequences of PE for educational evaluation are further detailed in the next section.

Before proceeding to the next section on the influence of PE on IEP development, let us consider how, in an overall sense, teaching is conceived of within PE methodology. Teaching is conceived of as the causing of learning or of changes in behavior (PE often defines learning as a change in behavior due to experience). This conception of teaching is in accord with PE determinism which asserts that every event has a specific cause or set of causes. The teacher or program, then, is one among many environmental causes of learning in the student. The role of the teacher is to gain as much control and power as possible over those environmental events that will cause learning. A result of all this is that a teacher committed to the PE view will have difficulty conceiving of teaching in any way other than deliberately controlling and changing behavior. This is why, for example, the behavior modifier is often sincerely puzzled when he is criticized for being manipulating and controlling. He does not understand how one would engage in teaching except by manipulating and deliberately changing behavior. And the behavior modifier is apt to see alternative approaches to teaching as merely "weaker" or even less honest attempts to do the very same thing he is doing. Genuine alternatives to PE-based teaching are offered later in this paper.

The Influence of PE on IEP Development

The influence on educational methodology described in the section above is paralleled in the development of IEPs. First, following PE principles, IEPs should be prescriptive. IEPs should be planned, developed, and written beforehand. In other words, the more the content and objectives can be developed and explicated in detail before the program is actually implemented, the better. There should be a minimum of mid-program shifts, in unexpected turns, or in the emergence of unplanned activities and objectives. Second, the objectives of the IEP should be written down in the preplanning in as detailed and precise a meanner as is possible. Third, the learning activities and tasks should be analyzed and developed in small units or steps. These steps should be written down beforehand in the prescriptive mode and laid out in a sequence leading to the objectives. Fourth, there should be explicit provisions for insuring that the student's motives are directed toward the program's prescribed objectives. Finally, the IEP should be evaluated against its initially and precisely stated objectives.

Above all, PE's determinism and exhaltation of the explicit and precise results in a greatly exaggerated reliance on and faith in the *written* feature of program planning and development. This is PE's prescriptive consequence. The belief is that *every* significant aspect of a program, *all* of its qualities and benefits, *everything* that it consists of, can be written down beforehand. The elements of spontaneity, surprise, improvisation, adaptation to the unexpected, and creativity are minimized.

The Influence of PE on Educational Evaluation

The consequences of PE ideology for evaluation in education have been severe: evaluation has been restricted almost exclusively to what can be called an *outcomes* approach. In outcomes evaluation, instructional programs, teachers, methods, and learning experiences are all evaluated according to the outcomes they produce in students. The evaluation can consist in determining how well a program achieves its own projected outcomes or it can consist of comparing one program against another on their achievement of a given set of outcomes. In recent years, outcomes evaluation has come in for some hard criticism (Apple, 1975; Kliebard, 1975; Scriven, 1974). The remainder of this section will primarily be devoted to drawing out the limitations in this type of evaluation.

Although the evaluation can be directed either toward prescribed outcomes or toward outcomes that are fortuitous or incidental, PE-based evaluation is primarily interested in evaluating prescribed outcomes. It is thought that the way to *demonstrate* that a program "works" is to initially commit oneself to specific outcomes and then, following the program or "intervention," detemine to what degree those outcomes have been achieved. To claim credit for outcomes achieved in a "post-hoc" manner is considered to be not quite legitimate: one might, after all, easily take credit for almost any outcomes arising out of a range of sources having nothing to do with the program.

Morevoer, it is clear that outcomes evaluation corresponds well to prescriptive teaching models and to the PE principle of determinism. Thus, if teaching is essentially prescriptive, with learning outcomes or objectives projected at the start, then the way to evaluate that teaching is to determine how well the prescribed outcomes have been achieved. The whole process assumes that learning outcomes are essentially determined by specific events that are potentially under the control of the teacher. Furthermore, these events or "causes" of learning are under the control of the teacher because, according to the PE principle of empiricism, they are environmental and external to the learner.

Since it is possible to gain control over the causes of learning, a major effort is made to identify those causes (methods, techniques, activities, materials, principles, etc.) that best achieve prescribed outcomes. The effort has mainly consisted in comparing various causes for how well they achieve prescribed outcomes. This describes the PE view of how to provide educational practices with a "scientific" basis. It is thought that through the "objective" methods of scientific research we can gradually determine cause-effect relationships; we can find out which particular programs, methods, teaching acts, and so on lead to which particular learning outcomes. Progress in education is thus largely a matter of improving our ability to predict and control the causes of learning. The power of this scientistic ideal is evident in the vast amount of time and energy that has been devoted to this kind of research and evaluation during the twentieth century. Unfortunately, this ideal ignores the serious distortions and limitations in outcomes evaluation.

Some of the more serious problems are a consequence of separating means and ends in outcomes evaluation. The means or activities in education are placed in a separate category from educational ends or outcomes: activities are *evaluated* and outcomes are the criteria *for evaluating* those activities. It is as if activities and ends belong to different realms of reality, with each having its own distinct and special function. A number of critics have pointed to the fundamental error of this means-ends split in outcomes evaluation. (Apple, 1974; Doll, 1972; Kliebard, 1975). Kliebard puts it this way:

> ...they [instructional objectives] have no meaning outside the context of the means toward their achievement . . . the creation of a sharp dichotomy between means and ends or the consideration of means only in the context of efficiency is, pedagogically speaking, a travesty. From an educational point of view, behavior, in and of itself, is of little significance. It is, on the other hand, critically important to know how one comes to behave as he does; whether, for example, a given act derives from mere conditioning or from rational decision-making processes. (p. 67)

If, as Kliebard has stated, "behavior, in and of itself, is of little significance" and it is "critically important to know how one comes to behave as he does," then we cannot merely use behavioral outcomes achieved as the basis for determining the value or merit of activities. Rather, we must account for the full context of the educational experience and subject the means and activities themselves to examination and evaluation. For, as Kliebard has pointed out, a given outcome could be arrived at by very different means: by conditioning or rational decision-making, for example. This kind of difference can well be crucial in determining whether or not we are willing to ascribe the *evaluative* term "educational" to an activity *and* its outcome. This is why behavior in and of itself has "little significance."

John Dewey expressed a similar view toward means and ends:

> . . . ends arise and function within action. They are not . . . things lying beyond activity at which the latter are directed. They are not strictly speaking terminals of action at all. They are terminals of deliberation, and so turning points inactivity. (Archambault, 1964, p. 70)

> . . goals of action . . . are ways of defining and deepening the meaning of activity. Having an end or aim is thus a characteristic of *present* activity. (Archambault, 1964, p. 72)

> . . . the external idea of the aim leads to a separation of means from end, while an end which grows up within an activity as plan [sic] for its direction is always both ends and means, the distinction being only one of convenience. Every means is a temporary end until we have attained it. Every end becomes a means of carrying activity further as soon as it is achieved. (Dewey, 1916, p. 124)

Since ends are "turning points in activity" and "are not things lying beyond activity" and since the distinction between ends and means is "only one of convenience," we may conclude that ends cannot, at least in any complete and determinate sense, be projected prior to activities themselves. For the same reasons we may reject the notion that ends can serve as independent criteria for determining the merit and worth of activities.

Another problem in separating means from ends is that it contradicts a basic notion of the nature and meaning of education: that it is intrinsically valuable and not merely instrumental to other ends or values. Turning again to Dewey:

> . . . the aim of education is to enable individuals to continue their education . the object and reward of learning is continued capacity for growth . . . . In our search for aims in education, we are not concerned, therefore, with finding an end outside of the educative process to which education is subordinate. Our whole conception forbids. (1916, p. 117)

And more recently Peters expressed a similar view on the nature of education:

> The natural way of asking for an extrinsic end is to ask what a man's purpose is in doing something or what his motive for it may be. These are strange questions to ask about education itself, for as "education" implies the transmission of what is of ultimate value, it would be like asking about the purpose of the good life. . . (1967, p.7)

This conception of education points up the inadequacy of outcomes evaluation. Once it is understood that educational experiences have intrinsic value there is no longer an impulse to separate means from ends.

Perhaps the most serious of problems arising out of the means-ends separation is that, in the last analysis, evaluation never actually occurs. On the one hand, the separation draws attention away from the need to evaluate educational activities in and of themselves and to subject them to analysis for their merit, value, and worth. On the other hand, the separation distracts from the need to evaluate ends in and of themselves. Activities are supposedly evaluated through ends or outcomes, but those ends themselves are never evaluated for their desirability and worthiness.

Critics of outcomes evaluation have pointed out the need for evaluating ends or outcomes themselves (Doll, 1972; Jackson, 1974; Kliebard, 1975; Scriven, 1975). Of course, an evaluation can only be considered complete and adequate if the total educational experience, as an integrated whole, is subjected to study and analysis; both the activities and outcomes must be subjected to evaluation in an integrated manner. That is, although we may temporarily separate means and ends for special purposes, we must always bring them back together, for each is complete in its meaning and significance only when joined with the other.

In outcomes evaluation, with its separation of means and ends, the *value* in *evaluation* is eliminated. No *value* judgments are made with respect to the educational activities as they are assessed for only how well they contribute to the achievement of the outcomes. Neither are the outcomes subject to value analysis; they are simply taken as given and they are uncritically used as the basis for determining the merit of the activities. Here is Jackson (1974) on this problem:

> Broadly speaking, evaluation involves making a judgment about the worth of something, but in the field of education the term has taken a much narrower

> connotation of measuring the effectiveness of a given procedure or set of procedures. (p. 91)

Apple (1974), after pointing out that evaluation consists in placing value on objects, chided educators for failing to account for value choices in their commitment to a "product-process rationality," and stated that:

> Educators share an unconscious commitment to a form of reasoning that assumes that considerations of instrumental effectiveness when confronting human action are the only ways of generating decisions. (p. 9)

This avoidance of making value judgments and choices is the consequence of the PE principle that values are arrived at without rationality and arbitrarily.

Belief in the ultimate arbitrariness of values leads to attempts to avoid the problem of how value choices are made. Thus, outcomes or objectives are simply accepted as "givens" in the educational context, and activities or means are selected and judged according to how well they achieve those "given" outcomes. But outcomes, or for that matter activities, are never really "given"; they are the result of value choices that have been made somewhere along the line:

> . . . evaluation cannot be simply a question of assessment . . . [this] simply ignores the fact that the choice of *what* one is to assess is itself a valuative decision . . . [Education] must be held accountable and evaluated according to ethical norms as well as considerations of instrumental effectiveness. (Apple, 1974, pp. 25-26)

Outcomes evaluation and its means-ends separation permits the evaluator the illusion that he is totally "objective" and engages in no value judgments. Actually, the process merely hides the value judgments that have been made, allowing them to function outside the purview of critical thought. In contrast to achieving objectivity, the process allows for the worst kind of biases and prejudices to exist without notice or correction.

The Influence of PE on IEP Evaluation

Just as the PE belief-system results in an outcomes approach to evaluating educational practices in general, it also does so for evaluating IEPs. IEPs are evaluated according to how well they achieve projected outcomes or objectives, usually the outcomes projected for that IEP itself. This kind of evaluation requires that the objectives of the IEP be prescribed and projected before implementation occurs so that it can be unambiguously detemined to what degree the program as developed accomplishes what it claims to in its stated objectives and purposes. The long-range PE goal is that through wide and repeated application of this type of evaluation means, materials, learning activities, etc. will be "validated" for achieving particular kinds of outcomes. In this way, IEPs will be objectively and scientifically validated, and their means or procedures can eventually be standardized for repeated and wide use. It is worth noting once again that this long-range PE goal places a great emphasis on the *written* aspect of program development, for it is only those aspects of a program that are written or recorded in some way that can be repeated and offered as a model for *standard* use.

In the means-ends separation that occurs in PE evaluation (see pp. 13-15), the means, procedures, or learning activities of IEPs are not in themselves subjected to evaluation for how well they exemplify desirable educational standards. Instead, means and activities are evaluated only with respect to how they contribute to prescribed outcomes or objectives. Further, neither are IEP objectives subjected to value analysis; they are treated as given and they are made the exclusive and ultimate criteria for determining the program's value and success.

We are now ready to move on the the alternatives that have recently been developed to the PE belief-system. First, the philosophical and psychological sources and bases for the alternative belief-system are reviewed. Then, as was done for the PE system, the educational consequences, both methodological and evaluational, of the alternative system are described. Following the discussion of educational consequences, the IEP criteria are presented. These IEP criteria are derived from the alternative belief-system and its educational consequences.

CHAPTER II: ALTERNATIVES TO THE PE BELIEF-SYSTEM

This section provides an overview of alternatives to the PE view of man and reality. These alternatives, developed primarily in psychology and philosophy, have been gaining strength in recent years. Only a limited exposition of reasons and arguments can be included in the space available here. The sources referenced below provide any interested reader with the information for pursuing these ideas further.

Humans Are the Centers of Action and Initiation

PE, it will be recalled, is committed to the view that the basic source of all our knowledge is immediate, environmental experience. Combined with a mechanistic determinism, it is asserted that all growth in learning and knowledge is the result of specific environmental causes. Ultimately, we are given a view of humans as passively reacting to the forces around them.

One significant consequence of PE's mechanistic determinism has been the dominance of the S → R paradigm in psychology for most of the first half of this century. The S → R paradigm places the source and initiative for learning and knowledge in the external environment. A striking contrast to this view has been steadily growing and gaining credence in psychology, supported in good part by the developmental studies and theories of Piaget (1971) and of linguists (McNeill, 1970). This contrasting view emphasizes that all learning, behavior, and growth is interacting and, moreover, it places the initiative with the individual as a center of action from the moment of conception. Knowledge and learning are not passively received, copied, or drawn from the environment, but actively constructed. Significant learnings, including the learning of language, are seen as inventive constructions.

The concept of an active and initiating being has imminent within it the idea of purposefulness, and self-direction. We turn to these ideas next.

Self-direction, Purpose, and Freedom

PE constructs a deterministic world, governed by efficient causation. All behavior and thought, including motives and purposes, are the outcomes of specific causes. In contrast to this deterministic PE view, we have the view that humans are self-directive, purposeful, and free.

To begin with, thinking may be described as teleological activity (Blanshard, 1973; Rychlak, 1968), best explainable in the light of its own end--the understanding of the nature of things. The teleological character of thinking is clearly evident in problem solving, when thoughts and ideas are governed by the individual's purpose, his goal of achieving a solution. To be governed by one's own ends and purposes is to be self-determined and it is the meaning and essence of freedom. Teleology in thought is also evident in the way humans constantly seek, select, and construct goals in life. As they do so, they also seek out value-hierarchies (Rychlak, 1968). This purposeful construction of goals and value-hierarchies can be referred to as self-growth or self-development.

Viewing individuals as centers of action and initiation, as described in the previous section and, in this section, as purposeful and goal-directive, carries the implication of a definite degree of independence from external forces. An essential feature of living systems is that they are self-regulatory and self-maintaining (Kurtz, 1965; Piaget, 1971), enabling them to retain their integrity and autonomy in the face of external, environmental assaults. At the human level, this independence and autonomy serves as the basis for maintaining the coherence and direction of thought within constantly shifting circumstances and events in the impinging environment.

Turning to the closely related issue of motives, it will be recalled that the PE belief-system results in conceiving of motives as essentially environmentally and externally determined. Those PE psychological models that use "within-the-individual" constructs to explain motivation have often defined the constructs in physical or physiological terms. Thus, we are given a picture of humans as being mindlessly and mechanistically pushed and pulled, either by external forces in the environment or by physical forces from within. The alternative offered here to this PE view is that motives and volitions exist in their right and cannot be completely reduced to the physical or physiological. Motives are not physical drives or causes that lie behind behavior, but rather a special class of self-determining behaviors that give humans an active role both in the causal-complex that surrounds them and in the shaping of their own lives and behaviors.

These are the alternatives to the PE assumption of passive and determined humans, subject to the pushes and pulls of their environmental experiences. We see instead a concept of humans as self-directive and purposive, as capable of freely deciding, and as having a high degree of responsibility for their choices.

Creativity and Generative Power

Very closely related to conceiving humans active, free, and purposeful is the view that ideas and knowledge can extend beyond the immediately given, thus exhibiting human creative and generative powers. PE, on the other hand, attempts to account for all knowledge and ideas deterministically, through direct and immediate environmental causes. PE needs its determinist principle in support of its premise of prediction and control over events. Let us take a look at the contrasting view that proclaims the reality of creativity, novelty, and emergence.

First, we may note the power of concepts to carry individuals beyond immediate data and what they have experienced to the potential, the possible, and the as yet unencountered (Northrop, 1959; Scheffler, 1967). It is but an aspect of this power that is demonstrated every time a given concept is applied by someone to any one of its unpredictable and unendingly different instances. In the same way, with the use of any principle, rule, generalization, or scientific law, which are universal in their meaning and application, experience and observations, which can be limited and finite, are transcended. All this calls attention to the generative power of thought and to the human capability for interacting with reality in inventive and unlimited ways.

Another way humans show their generative power is in ordinary interactions with the environment which result in learning. Rather than merely copying reality or passively absorbing information in these interactions, the individual actively transforms and organizes what he takes in (Piaget, 1971). In this way an experience is constructed that goes beyond and is *richer* than what the environment has provided. Furthermore, human reasoning is used, both imaginatively and critically, to construct alternatives to any belief, proposition, fact, or theory (Rychlak, 1968). Thus new possibilities and meanings which transcend experience are speculatively and creatively produced.

Finally, we can point to the capability of not only humans but the lower animals for creative adaptation (Koestler, 1967; Taylor, 1964). When blocked in achieving a goal or solution to a problem, or when confronted with unexpected circumstances, individuals inventively vary their behaviors, creating new patterns out of previously learned ones.

This section points up the generative and creative features of human behavior. Humans are not here depicted as being determined in their behavior and limited by experience. Rather, they are seen as enriching their environment, as truly bringing novelty into the world, and as creatively adapting to meet the unpredictable.

Comprehensive Wholes

In PE a primary method for gaining knowledge and control is through reductive analysis. This section presents the alternative to reductionism, the view which attests to the power and reality of comprehensive wholes.

Suppose we take the ordinary act of walking. At the molar level we easily recognize the act of walking when we see it. This molar act can be reductively analyzed into its neuromuscular components. There is no denying that such reductive analysis can add to our knowledge. What must be avoided is the common PE assumption that the molecular reduction completely accounts for and *defines* the molar act itself, or that the molecular units are the determinants of the molar act. Instead it is the molar act which determines the sequences and behaviors of the neuromuscular components, not the other way around (Chein, 1972). The same may be said of other familiar and ordinary molar activities, for example, the activity of speech. The lower-level parts of speech are controlled and determined by their higher-level, more comprehensive units (Koestler, 1971; Polyani & Prosch, 1975). Speech sounds are determined by words, words by sentences, sentences by style and mode, with all being controlled by *meaning*. Since each level of subcomponents is indeterminate until given direction by its higher-level entities, the higher cannot be accounted for by the lower ones. Although words and meanings are rooted in their sounds, just walking is rooted in its neuromuscular components, they are comprehensive entities with a reality of their own and they are determinate over the lower-level components they are rooted in.

The conclusion to be drawn is that comprehensive wholes have a reality and meaning beyond their subcomponents which they cannot be completely reduced to. Moreover, the direction and control is from the higher and more comprehensive entities to their lower-order parts.

Generality, Indeterminacy and Growth

Let us now consider the PE principle of precision and see what its alternative might be. PE tells us that if we want to achieve knowledge and meaning we must aim to be precise, specific and explicit--the more so the better. To demand an alternative to this PE principle does not mean that precision is never to be desired, but that PE greatly exaggerates this need and the benefits to be derived from it.

As a starting point, some of the ideas already established will be drawn on. One PE technique for attempting to achieve precision of meaning is through specification of general entities into smaller components, usually through reductive analysis. But we have seen that to reduce comprehensive wholes to more specific components can destroy instead of increase their meaning. For example, consider the activities of singing or writing, which we can ordinarily recognize, describe, and evaluate in a rather straightforward and direct fashion. If we specified them into their lower-level physical, chemical, or neurological movements without returning again to the comprehensive activities, we would lose the meaning of those activities. Or, to take another example, for special purposes we could analyze a text into subcomponent passages, its passages into sentences, its sentences into words, and so on. However, the only way to grasp the meaning of the whole text itself would be on its own terms, as a comprehensive entity.

It may be concluded that there is often greater meaning and reality in *generality* than in specification. This is true for various kinds of events, objects, qualities, and ideas. Sometimes, for example, an educational purpose is most meaningfully described in general terms. And sometimes general purposes have a comprehensive meaning not to be found in the lower-level, more specific objectives they encompass.

Another way PE attempts to achieve precision in meaning and knowledge is to eliminate ambiguity and indeterminacy. The assumption is that the more precise and determinate the better and that we should *always* aim for the reduction of ambiguity and indeterminacy. But this cannot be so: if all were precise and determinate we would have a fixed and static world, with no opportunity for growth or the emergence of novelty. Only if there is ambiguity and indeterminateness can there be growth, creation, and new discovery. Indeterminacy, therefore, serves a valuable function in the growth of our knowledge. When a new theory is proposed its full consequences and implications cannot be known; its future benefits are not specifiable (Polanyi, 1964; Popper, 1968). A theory thus anticipates more knowledge than even its originator can know or guess.

All forms of inquiry and exploration are directed toward a hidden and indeterminate reality or truth which draws us onward in our search (Polanyi, 1964). Evidently what is not yet clear to us nevertheless directs us in our progress and growth and this is how it must be. There seems to be in human nature a drive to know and understand (Blanshard, 1973). This drive to know is directed by its own end, yet we cannot see that end clearly. We grope, but are not completely blind in our search.

What is presented here is in sharp contrast to the PE ideal that precision and specificity are to be aimed for everywhere and always. Instead, it is submitted that generality, indeterminacy, and ambiguity are not only necessities but have their own virtues. Ideas and entities are often known, described, and evaluated best at their higher and more general levels. At times, there is greater meaning and clarity at these more general levels and specification would only result in a loss of meaning. Also, our ideas and concepts generate new knowledge and discovery primarily at their outer and indeterminate boundaries. Finally, we are directed and guided in our progress toward greater understanding and knowledge by ends not yet clear to us.

Judgement and Value

Last, we come to the PE belief that values are arbitrary and arrived at without rationality. This belief proceeds from a dogmatically erected fact-value barrier by PE. On one side of the barrier are science, objectivity, facts, and certainty; on the other side there are values, subjectivity, opinion, and all varieties of judgement. The validity of this dichotomy can be seriously challenged (Scriven, 1975).

Even scientific activities constantly include the application of skilled judgement, without which the work of science would come to a halt. A scientist must be able to read off measurements accurately, recognize legitimate and promising problems in their disciplines, and select appropriate instruments or methods in their research. Furthermore, scientists must be able to judge the value of methods and theories and appraise them according to standards of excellence.

Apple, (1975), Jackson (1974), and Scriven (1975) have extended the notion of making judgements of value to evaluation in education. As previously described, Scriven insists that values can be subjected to rational analysis and that educational ends should be evaluated. Scriven's view is supported by those who argue that objective and rational judgements can be arrived at in the areas of morality (Taylor, 1961), in all varieties of practical affairs (Hampshire, 1965), and in determining the aesthetic characteristics or values of experiences (Dewey, 1946; Eisner, 1972).

The next sections present the educational consequences of the alternative belief-system which has been described. First the consequences for educational methodology are considered, then for educational evaluation.

Consequences of the Alternative Belief-System for Educational Methodology

The alternatives described in the last section imply an approach to educational methodology very different from that of PE. Much of what is contained in the alternatives and their educational implication are compatible with Dewey's educational theory, developed early in this century (Dewey, 1916). For example, Dewey emphasizes an active learner, developing activities out of the learner's experiences and interests, the intimate relationship between means and ends, and others. Doll (1972) uses the phrase *methodology of experience* to refer to educational ideas and practices derived from Dewey's work. Doll's use of the term "experience" is so very appropriate since Dewey places such a great emphasis on the concept of *educational experience* as the key to understanding the meaning and purpose of education. For convenience of identification and reference and in recognition of Dewey as a major source for many of the ideas presented in this section, the term *experience methodology* (EM) is used here.

The Development of Educational Experiences

Let us begin by considering how educational programs and experiences are developed in EM. The approach is very different from the prescriptive ones derived from PE. In EM the teacher does not attempt to entirely prescribe beforehand the program and its outcomes or objectives. This does not mean, of course, that there is no planning by the teacher. The teacher does plan, but only in a very general way, based on his knowledge of his students and the curriculum in general. The meaning of "planning in a general way" needs to be further explained.

In the first place, the teacher can generally outline promising goals and activities. However, the goals and activities typically become definite and clear only as the program progresses, or the goals and activities can shift and change from the original projection. In other words, the program develops and evolves, it is not fixed and definite beforehand.

One reason the program is not fixed and definite beforehand is because of the way the student fully and genuinely participates in determining the program's content and direction. As he expresses his interests and purposes, demonstrates understanding or confusion, and contributes his ideas the student takes part in shaping the program. The teacher is ever alert and responsive to the student and there is a true interaction, even though the teacher often takes a dominant guiding role.

Another reason the program is not fixed beforehand is to leave room for the unpredictable, for emergent ideas and unforseen occurrences. There may be significant changes in the students's life circumstances or within the student himself. What at one point was central to his life may become incidental, his interests and purposes might change, or he might develop basic new knowledge and insights as the program progresses. On the other hand, the teacher could change: he might develop new insight and understanding into the student's characteristics or problems, or of the nature of the curriculum, or he might more clearly see the significance of certain purposes. These kinds of changes cannot always be forseen and predicted.

Thus, the teacher and program in EM remain alive and responsive to changes and new developments. The educational program truly emerges and evolves.

But how are educational programs and experiences initiated in EM? Sometimes an experience is initiated on the basis of the student's expressed interests, purposes, questions, or concerns. The teacher may use the student's initial ideas and purposes for getting the experience started, meanwhile helping the student to clarify his ideas and purposes. At other times an experience may be initiated by the teacher. On the basis of what he knows about the student, the teacher can project what is likely to engage him and make sense to him, or how the student is likely to respond to certain suggestions and events. The techniques the teacher can use for initiating experiences are unlimited and varied: read or tell a story, pose questions about the workings of physical reality or of the social world, suggest a project, open a discussion about an emotionally compelling incident in which the student was recently involved, show a film, or take a field trip. In short, based on his knowledge of student and the curriculum, the teacher has some notion of the kind of initiating activities that have potential both for engaging the student and for developing into a full educational experience.

Comprehensive Wholes

PE, in its emphasis on reductive analysis and precision, makes heavy use of methods which reductively analyze learning activities into their smaller and more isolated components, as is done in programming or in task analysis.

In contrast, EM stresses a wholistic approach to teaching and learning. EM methods often center on larger-scale units of learning activities, such as "experience" or "activity" units, or "projects", or "problem-centered" learning. These wholistic units tend to be derived from, or built around, ordinary and naturally-occurring social activities that are familiar to both the teacher and student. The various component learning activities and tasks then grow out of, relate to, and are guided by the central purpose or problem of their larger unit. The fact that these wholistic units are based on naturally-occurring activities insures that they have meaning for the student and teacher.

Of course, in EM as well as in PE educational approaches to activities and tasks must often be isolated and reduced to smaller units for special study or mastery. However, in EM the reductions generally occur only after an activity's relationships and significance have been made apparent by the purposes and tasks of the larger unit. The EM teacher, in keeping the principle of comprehensive wholes in the forefront of his thinking, is constantly aware of the need to return temporarily isolated activities to their wider contexts so that the learner does not lose their meaning. For example, when concentrating on word analysis lessons, the teacher will make certain to return the learner in various ways to the whole act of meaningful reading itself so that the learner does not lose sight of the wider purpose and significance of mastering word-attack skills.

It should be apparent that this use of the principle of comprehensive wholes, of deriving activities from natural social contexts, works hand-in-hand with basing program development on the student's interests, problems, or concerns. That is, the student's naturally occurring interests or concerns grow directly out of his everyday social life and they therefore ordinarily make the greatest of sense to him. Of course, it is also the teacher's responsibility to be ever-ready to stimulate and guide the student beyond his spontaneous interests and concerns to those of wider educational significance and benefit.

The Teacher's Responsibilities

The teacher's role in either the initiation or development of educational experiences, although not prescriptive, is nonetheless active. Using his greater experience, knowledge, and maturity the teacher must guide the student in the experience. When the teacher responds to the student's spontaneous interests and activities, there is a sense in which he is following the student's lead; however, there is another sense in which the teacher takes the lead: he is ever alert to turning the pupil's purposes and interests to areas of wider educational significance. What might otherwise be narrow or even stultifying because of the student's limitations can often be transformed into activities having genuine educational benefits. It is the teacher's responsibility to be aware of the broader and deeper educational possibilities at the outer edges of the student's present abilities, knowledge, and interests and to help the student by prodding, supporting, and stimulating him to realize those possibilities.

Fitting the Program to the Student

In EM, because the student's active participation is so basic, there is a sort of built-in insurance that the educational experience reflects the student's present capabilities. In contrast, when the experience is imposed from the outside, as in PE teaching, there is always the danger that the tasks, activities, and goals will not be suitable to the learner's characteristics and capabilities. The very nature of EM makes it likely that the program activities and purposes will be meaningful, interesting, and comprehensible to the student. However, it is worth reiterating that while EM draws upon the student's present activities and capabilities, it is essential to EM strategy that the pupil be extended beyond his present limits.

The Use of Prepared Materials

It follows from what has already been stated that EM does not use prepared guides, programs, or other teaching or learning materials in a prescriptive manner, no matter how carefully developed and "validated." Activities and purposes emerge, students develop and grow, events take an unexpected turn, and the teacher's understanding of the student and his needs deepens. Creative growth, emergence, and unpredictability preclude the notion that programs could be validated and then used over and again with different individuals or in other times and places without essential modification. This does not mean, of course, that research and experience can contribute nothing to the development of programs and materials. Guides and other materials can be developed for widespread and repeated use, based on *general* knowledge of students' characteristics and needs. Nevertheless, such prepared materials can only be used as general guidelines and as sources for suggesting ideas since every individual or group will demonstrate *some* qualities that are unique, each time and place will have some characteristics peculiar to itself, and growth and change are emergent and never wholly predictable.

The Meaning of Individualization

The ideas that have been considered to this point lead to the question of how individualization is conceived of in EM. In PE teaching, individualization consists primarily in adjusting to the varying learning rates of individuals and in attempts to develop varying teaching methodologies. However, in varying methodology, there has generally been an attempt to develop standardized sets of methods for corresponding sets of learning styles or problems that have been identified. Furthermore, in PE, the content and goals of programming tend to remain essentially the same for all students. In EM, on the other hand, individualization means accounting for the student's unique interests, purposes, or problems in determining the very content and direction of his program. Here, the student's uniqueness is reflected in the program he himself actively contributes to developing.

It must be noted that this EM strategy of individualization is not opposed to group teaching and learning. There is no question but that students of a similar chronological age, living within a similar place and time, will have common experiences, ideas, and characteristics. The whole notion of a society or of man as a social being implies the possibility of common interests and purposes and of shared lives. Much of education consists of learning to work with others toward a common goal, exchanging ideas and points of view, and being enriched through contact with the perceptions and ideas of others.

The point, then, of EM individualization is not that every individual must have a program entirely different from that which every other individual has, or ever had. Rather, it means that out of the particular life circumstances of an individual or group of individuals, an educational experience emerges and develops, with the students contributing to that development. Thus EM individualization means that the content and purpose of a program or experience cannot be standardized, prescribed, and used repeatedly with different students and in different times and places.

The Relationship of Teaching to Learning

Much of how EM teaching relates to learning has already been touched on. Earlier PE was described as holding the narrow view that teaching can only mean causing changes in the learner's behaviors. With the PE separation of means and ends, the outcomes of behavior change take on an exaggerated importance. In EM means and ends are seen as intimately related so that not only must outcomes be considered, but also *how* those outcomes were produced. Any changes that are caused in the student must be by *educative* means. To cause changes in the student by conditioning, propaganda, fear, or misinformation is not educative; these means narrow the student and tend to stunt or inhibit his educational growth. Teaching through educative means, on the other hand, expands the pupil's capacities, leaving him ready for further growth (Dewey, 1916). Such means generally consist of increases in knowledge, understanding, and appreciation.

Furthermore, since EM sees the learner as purposeful, capable of freely choosing, and responsible for his behaviors, it does not demand that teaching always, without fail, produce changes in behavior. Often it can legitimately be called teaching to expose students to experiences, to suggest, to present reasons, arguments, and new ideas, and so on, all with the intent to expand the student's understanding, knowledge, and appreciation, yet leaving it up to the student to actually decide how or whether he will accept these experiences and change. The teacher may hope for certain outcomes from his efforts, but it is, after all, often up to the student as a free individual to decide what he will accept and incorporate into his life.

Is the Program What is Written Down?

As described in previous sections,a consequence of PE prescriptiveness is to place great reliance and faith on the written feature of program planning and development. This raises the issue of what kind of relationship exists, or should exist, between the program as written and the program as actually implemented. PE holds forth the ideal that implementation should be as close as possible to what has been prescribed. EM, on the other hand, insists that program *development* occurs during implementation as well as during the pre-planning. That is, purposes can change or become clarified, new goals or interests can emerge as an outcome of ongoing activities, and unexpected obstacles can be encountered. Thus, EM sees the written part of the program as only a preliminary guide to program implementation. The function of written plans is not to mirror as exactly as possible the concrete program itself, nor is their function to fully prescribe, constrain, or predict the program itself. Rather, the written plans should serve to project the initial direction and purposes, with full realization that much of what is as yet unknown and unpredictable must develop and emerge as the program is carried out.

CHAPTER III: CONSEQUENCES OF THE ALTERNATIVE BELIEF - SYSTEM FOR EDUCATIONAL EVALUATION

The alternatives to the PE Belief System have striking implications for educational evaluation as well as for educational methodology. The term EM was used to name the methodological approach implied by the alternatives to PE. For convenience, the term EM will continue to be used to name the educational evaluation approach implied by the alternatives to PE.

EM affirms the independent reality of comprehensive wholes and recognizes in reductive analysis there is often a loss in meaning. These beliefs have certain consequences for the way evaluation is approached in EM. One of these consequences is that there is an emphasis on what is called contextual evaluations in naturally existing settings–a form of evaluation similar in many respects to what has been called naturalistic research (Apple, 1975; Jackson, 1974), but having features beyond naturalistic research. To bring out the character of EM evaluation, the contrasting PE approach will first be briefly reviewed.

PE attempts to achieve prediction and control over events and the ideals of scientific objectivity and certainty in evaluation. To obtain control over events, specific cause-effect relationships must be established. Cause- effect relationships are extremely difficult to identify in the flow of events in the natural, so PE turns to scientific methodology. To identify specific causes and effects, PE uses the method of experimental control and isolation of variables. One limitation in control studies is that we can never be certain *all relevant* variables are controlled. There may always be variables we have not identified that contribute to effects and outcomes. In fact, the possible factors influencing outcomes are generally unlimited and so we can never be certain that we have identified all of them.

Another limitation is that the more we control in order to reduce complexity and ambiguity and to determine specific causes and effects, the more artificial the situation and the study becomes. In contrast to the isolation and separation that occurs in controlled studies, in natural settings, events and phenomena occur as *interacting complexes*. Any given phenomenon will take on a character depending upon the context of interactions within which it occurs. Change its context and the phenomenon can radically change in its character and its effects.

For example, suppose we wish to determine what the consequences for learning in the student are of a particular teaching characteristic, say the characteristic clarity of expression. Attempts to develop a controlled study and to isolate the characteristic and its effects are bound to result in distortion. Not only will clarity of expression have a different character and meaning in various kinds of teaching-learning contexts, but the different complexes of other traits that various teachers have and that surround and interact with clarity of expression will also differentially affect its character and meaning.

These same considerations apply to evaluating methods of teaching. Using the techniques of isolation and control in the attempt to determine the specific effects on learning of a teaching method results in a certain degree of distortion. We cannot actually determine the effects of teaching methods in and of themselves. The methods and their results are affected by the contexts of situations and learners with whom they are used. Moreover, teaching methods are used by teachers having a host of personal characteristics and skills which form interacting complexes within which the methods are used. Again, a given method used within different interacting complexes will have a different character and effects.

The study of variables through their isolation and the method of control is a form of PE reductionism. PE considers reductive analysis as a major scientific technique in accounting for cause-effect relationships. EM, in its appreciation for the reality and independent meaning of comprehensive wholes, insists that we study and evaluate phenomena in their contextual settings. But how is this evaluation done? This kind of evaluation frankly calls for the use of judgement and appraisal; we abandon the illusion that we can achieve certainty through objective means that by-pass the need for making judgements and appraisals. We cannot achieve certainty, but we do have some rational means for coming to conclusions and decisions. Knowledge and experience with respect to the educational process can provide a basis for bringing evidence and reasons to bear in the evaluations we make. Furthermore, there are recognized criteria and standards for evaluating educational experiences (some of these are described in this section). We can often determine how likely it is, taking into account the students and the setting, that a given method, technique, or activity either did or will have certain consequences for student learning. We can also make judgements on how good a choice a method or activity is with respect to the abilities of the students, the teacher's purpose, and so on. The point is that we evaluate any educational part or component within its total context or whole.

This same notion of evaluating contextual wholes applies to the means-ends questions. EM views the means and ends of an educational experience as a comprehensive whole and evaluates each in relation to the other. PE evaluation separates means from ends so that it is in constant danger of overlooking causes or means. In PE evaluation, the major effort is directed toward determining how well *prescribed* outcomes were achieved through *prescribed* activities. This predisposes the evaluator to look for prescribed means as the causes of whatever outcomes are achieved. The evaluator's view is funneled and narrowed so that means or causes not prescribed go easily unnoticed or undiscovered. And the practice of emphasizing outcomes apart from means in the evaluation only increases the chances that means or causes not initially thought of and prescribed will be overlooked.

In EM evaluation, in contrast, since there is a constant attempt to evaluate means and ends in relation to each other, the likelihood is greater that unexpected means and causes will be identified. The EM evaluator attempts to *account for* outcomes through activities. If a particular outcome is puzzling, the reasons or possible causes will be searched out. There is an attempt to make sense of the total educational experience by moving constantly from ends to means and from means to ends. This makes it unlikely that the evaluator will automatically assume prescribed activities as the causes of the outcomes. Even more, it predisposes the evaluator to search out means and activities that might not have been preconceived or deliberately planned for.

Another consequence of PE outcomes evaluation and means-ends separation is that educational means are not themselves evaluated. This consequence leads to yet another kind of danger: any means become justifiable as long as the desired outcomes are achieved and, further, possible harmful outcomes of activities and means are easily overlooked. When means are placed into a separate category from ends and considered to merely be instruments, then the tendency is to place all attention on whether or how well the outcomes were achieved. With our eyes fixed on preconceived outcomes, it is easy to overlook harmful effects of means. A particular method or activity may contribute to the prescribed objective of increasing a reading skill, yet may also contribute to developing a poor attitude toward reading, or perhaps a tendency to become dependent upon the teacher. With EM the character of the means and activities are themselves evaluated at the same time they are related to outcomes. Thus, the EM evaluator is alert to a variety of possible consequences a given activity may have.

To turn now to the *prescriptive* feature of PE. According to PE, it is not legitimate to "take credit" for outcomes that were not specified and projected beforehand. This means that there is no way to account for emergence, growth, and the unexpected in PE evaluation. EM, on the other hand, fully accepts the emergent and the unexpected. This means that *retrospective* evaluation is legitimate in EM. One can look back upon means and activities and make *some judgement* as to whether and to what degree they may have contributed to certain achievements or consequences. It is recognized in EM that a given activity or means has a likely or possible range of effects and consequences, not fully determinate and specific ones. Thus, there is a basis for retrospectively judging the likelihood that outcomes achieved were derived from certain means.

The prescriptive and determinist principles of PE have another effect on educational evaluation. The emphasis is on evaluating by comparing the program and its objectives as they are projected and written down beforehand against the program outcomes as they are *recorded* in some fashion. Once again we see PE's exaggerated reliance on what is written down. EM recognizes that there is a difference between the program as it is prescribed or written down in pre-planning and the program as it is actually carried out. Further, EM recognizes the difference between outcomes as they are or can be recorded and the actual outcomes. Aside from the obvious fact that there must always be a multitude of outcomes that remain unknown and unrecognized, it is also true that not all types of outcomes lend themselves to being recorded. Furthermore, EM's denial of means-ends separations relates to the issue here. EM insists that program evaluation must be total, with means or activities and ends or outcomes being evaluated together. The implication is that program evaluation should include observations of the actual events and activities of the ongoing program.

In short, EM denies that a full evaluation can be made through an examination of the written and recorded aspects of the program. Evaluation must include observations of the ongoing program itself.

The EM non-determinist and non-prescriptive features also have some very definite implications for evaluating teaching. PE is willing to call teaching only that which deliberately causes learning or changes in behavior. This means that teaching PE is evaluated solely in terms of consequences for learning. EM evaluation of teaching is very different. EM recognizes the learner's independence, freedom of choice, and self-direction. The learner is free to ignore, reject, or transform to his own purposes what the teacher provides. Thus in evaluating teaching it is not enough just to consider what learning outcomes were produced; the teacher's actions and efforts themselves must be evaluated in light of the total context. Furthermore, EM allows for the unforseen that may block progress or thwart purposes. Therefore, whether the teacher is to be faulted for not achieving certain outcomes or praised for what he did despite the fact that he may not have achieved projected outcomes, will depend upon the total context within which the teaching occurred.

Finally, we come to the question of *value* in evaluation. PE evaluation merely determines the degree to which outcomes were achieved and fails to determine the value or merit of either the outcomes themselves or the means, except in the sense of how well the means contributed to achieving the unevaluated outcomes. EM takes an entirely different approach to evaluation. In evaluating the *total* educational experience, relating means and activities to ends and outcomes, EM attempts to determine the value of these experiences according to widely recognized educational standards. Some of these standards and criteria which can be used in evaluating educational experiences are briefly described below:

1. The experience and activities should engage the student's interest. If the student is involved and interested in the activities, this is a sign that they are well-suited to his needs and capabilities. This is, of course, only a sign; interest is not enough by itself to insure the value of the activities. This criterion needs to be used with others below. Also, it cannot be said that just because the student shows a lack of interest that the activity *could not* have value for him. There are times when the teacher can predict accurately that a given area would, if the effort were made, be interesting and valuable. However, a teacher here needs good justification if he attempts over a lengthy period of time to get a student involved in an activity he resists and rejects.

2. The experience should grow out of and relate to the student's purposes, problems, activities, or concerns. This is very similar to the criterion above and insures, first, that the student takes an active role in shaping his educational program. Second, it insures that the experience or program is meaningful to the student in the light of his capacities and purposes.

3. The experience should be potentially expansive for the student with respect to furthering the growth of his knowledge, understanding, and appreciation. It should have the potential of leaving him readier to further develop and learn.

4. The experience should pose realistic problems and tasks for student — realistic in the sense that the pupil would formulate them on his own or with some guidance. Realistic problems and tasks provide the opportunity for the student to apply and generalize his knowledge and skills, to gain experience in problem-solving, and to obtain practice in flexibly adapting to achieve his purposes.

5. The experience should encourage self-direction in the student and practice in formulating goals and objectives. To the extent that the student is capable, he should be encouraged to formulate his own problems and purposes and direct his own learning.

This completes the examination of consequences of the alternative belief-system for educational methodology and for educational evaluation. The ideas and principles that have been developed above, including the five standards just described, serve as the basis for a number of the IEP evaluation criteria proposed in the next sections. First, criteria for evaluating the quality of IEP documents are described. Following that, criteria are proposed for evaluating progress toward developing, reviewing and revising IEPs.

CHAPTER IV: CRITERIA FOR EVALUATING THE QUALITY OF INDIVIDUALIZED EDUCATION PROGRAMS

Criterion I:

Does the IEP demonstrate that it is built upon an assessment or diagnosis of the student's unique characteristics and needs?

Minimal

The goals, content, and activities of the program are based upon a record of the pupil's performance on psychological and educational scales and tests, either standardized or informal in construction. A major portion of the record should be criterion- or mastery-referenced in form. The primary areas of assessment should be those of (a) social, personal, and daily living skills and (b) academic skills. Additionally, medical and physical diagnostic data should be used when appropriate, that is, for students either who are known to have or who are suspected of having physical or health disabilities.

Maximal

In addition to the type of dignostic/assessment information described above, the student's personal goals, interests, concerns, problems, and spontaneous tendencies are made an integral basis of his educational program. There are two basic methods by which this can be accomplished. In the first method, the established and basic curricular-skill areas, such as reading, writing, math, perceptual motor, and language are centered around the interests or concerns of the student. If, for example, a student is interested in sports or in collecting coins, the teacher can build lessons, exercises, and learning tasks in these basic skill areas around the topic of sports or coin collecting.

The second method for relating the program to the student's interests, concerns, and goals is more basic than the first but is also much more subtle, complex, and difficult to successfully carry out. In this second approach the student's initial interests and tendencies are converted and developed into fully educational experiences. Here, through the student's original interests and activities, which may be narrowing and parochial, the teacher leads the student to broad educational experiences. Thus, the teacher uses his knowledge of the culture and of broad educational purposes to guide the pupil so that his activities achieve educational significance and value. To again use sports as our example, a pupil's interest in this area can be the basis for initiating learning tasks and activities. As the activities evolve and progress, the teacher guides, stimulates, and encourages the pupil to relate his sports interests and activites to such wider areas as the national economy, physical health and fitness, social leisure and entertainment, and the human need for fantasy, play, and competition.

In a similar way, a student's problems or concerns can become the basis for developing his educational program. If, for example, a student has serious social problems and extreme difficulty in gaining recognition from his peers, then an area of interest or a particular skill or talent can be developed so that he can bring his own unique and special contribution to the interactions and activities of his peers. Or perhaps a student has failed to develop a sense of confidence and self-worth because he has a handicap. The student's activities could consist of learning about other handicapped or disabled individuals who have achieved worthwhile goals and a satisfying lifestyle.

The written IEP document can provide evidence that this criterion is being met at a maximal level by including a description of what is known of the student's goals, interests, concerns, or problems and how they relate to the program's content and objectives. Furthermore, at the end of the school year or at some other appropriate point in time, a written summary can be included on how the student's goals, interest, etc. entered into the program as it actually developed.

Contextual or Circumstantial Considerations
How this criterion is met will largely depend on the student's intellectual maturity. The student's intellectual maturity will determine the degree to which he is capable of consciously and explicitly communicating his goals, interests, and problems and to what extent he can engage in critical self-reflection. For those students of low intellectual maturity, their interests, goals, and problems will be expressed in their spontaneous activities and immediate wants. The teacher must be knowledgeable in human development so that he can *interpret* the student's activities and wants and through his interpretations (a) reveal and determine the student's deeper goals, interests, and concerns, (b) project the future directions and consequences of his present activities are tending toward, and (c) determine what kind of educationally significant activities and learning tasks may be built upon and related to the student's spontaneous activities.

For students of greater intellectual maturity teachers can and should cooperatively, with those students, explore the meaning, significance, and possible future directions of their goals, problems, and interests. In other words, students with the intellectual maturity to communicate and reflect upon their goals and interests can fully and actively contribute to the planning and development of their own educational programs.

Similarly, a student's emotional health and maturity can determine the extent to which he has insight into his goals, interests, concerns, and problems. A student with seriously impaired emotional health may have little understanding or insight into his real goals, motives, or problems. Then it will be largely up to the teacher, with his knowledge of emotional development and emotional problems, to interpret and reveal the deeper meanings and significance of the student's spontaneous and unreflective wants, desires, and actions. On the other hand, the more a student has self-insight and self-understanding, the greater may he consciously and deliberately determine his own educational goals and program.

Relationship of Criterion One to Public Law 94-142 and to the EM Model
It is clear that the intent of Public Law 94-142 is to provide for the unique educational needs of each individual handicapped student. This intent is expressed in the following quotation taken from the Congressional Record:

> A feature of the measure. . . is the individualized planning conference. It has long been recognized by educators that individualized attention to a child brings rich rewards . . .(Individualized planning) conferences are to be held . . . to meet the unique educational needs of the child. (Congressional Record — Senate, June 18, 1975, Mr. Randolph, p. S10960).

As for the criterion's relationship to the EM model, EM embodies the concept that uniqueness and individuality are expressed in the student's goals, purposes, and interests, as well as in his rate and style of learning. Moreover, the EM model is committed to the notion that traits, characters, abilities, problems, purposes, and so on are revealed and expressed in interactions within actual, ongoing educational contexts. Thus, the student's goals and interests are not first identified outside of the ongoing educational context and then brought into and imposed upon that context. Rather, it is in the ongoing educational process itself that such goals and interests are manifested and revealed.

Criterion II:

Does the IEP demonstrate a concern for developing the student's ability to solve new problems and to transfer, generalize, and flexibly adapt his skills and knowledge?

Minimal
The transfer, generalization, and application of newly learned principles, ideas, and skills is supported by special exercises, tasks, and activities in the program. These experiences, tasks and activities requrie the learner to apply in varied contexts his newly learned principles, ideas, and skills. Also, the program has built into it problem solving exercises and tasks so that the student can obtain practice and guidance in problem solving.

Maximal
Actual problems as they arise become a part of and formulate the program. The identification, formulation, and resolution of problems constitutes a good part of the program, determining its very goals and activities. The program itself takes shape as real problems and unresolved questions or puzzles are identified and formulated. In this way, the student's skills and knowledge are called upon in

varied situations, providing for transfer and generalization. At the same time, the real problems that arise and are developed provide the student with the opportunity for learning to flexibly adapt his skills and knowledge and to solve problems. Thus, transfer, generalization, flexible adaptation, and problem solving are not so much provided for as they are an integral part of the program and educational experience itself.

Evidence that this criterion is being met at a maximal level can be provided in the written IEP document through including a description of the kinds of problems, questions, or puzzles that are *likely* to arise and engage the student, given what is known about him and his characteristics. At the end of the school year or some other appropriate point in time, a summary description can be provided of how actual problems played a part in formulating the student's program.

Contextual and Circumstantial Considerations

As in Criterion One, intellectual maturity is an important consideration. Naturally, the intellectual maturity of the student will determine the kind of tasks and problems that are appropriate for him. Students of relatively low intellectual maturity, let us say below the mental ages of five or six, will ordinarily engage in problems and tasks of a sensory-motor or perceptual-motor nature. That is, they will mostly be engaged in exploring and discovering their physical environment, how their bodies and movements relate to and interact with that environment, how objects react and how they may be used and manipulated, and so on. It is important that the student's program make available to him, then, ample physical space, manipulative objects, tools, materials, and playthings so that he can practice, explore, and discover.

On the other hand, for the student whose intellectual capacity is equal to or beyond the mental age of five or six, problems and tasks will take a more symbolic form, they will extend beyond his immediate physical environment, and they will include both physical and social problems that are abstract and remote in nature. Now the task of the teacher is to encourage the student to extend beyond his immediate environment through reading, stories, pictures, and trips; to use his immediate social and physical environment as a basis for imaginatively extending his experiences, his questions, and the problems he formulates.

Relationship of Criterion Two to the EM Model

The EM model states that the teacher should draw upon the student's spontaneous activities, interests, and concerns in developing educational experiences. In so doing, the student's already acquired knowledge and skills are brought into play. This knowledge and skill are thus used and applied in the context of an ongoing program and the student is given an abundance of varied opportunities to transfer and generalize what he has learned. Moreover, the EM method requires that the student's purposes, interests, questions, and problems be the basis for his educational program so that the development of problem solving ability is accounted for within the educational experience itself.

Criterion III:

Does the IEP demonstrate a concern for helping the student become self-directive and to achieve skill in formulating his goals and purposes?

Minimal
Time and opportunity are specifically and formally alloted within the program for the student to engage in independent activities of his choice and interest.

Maximal
The student's activities, interests, concerns, and tendencies form an integral part of his educational program, of its content and goals. Furthermore, the student is given the opportunity to formulate aims and purposes within his program and to determine how he will achieve those aims and purposes. Evidence that this criterion is being met at a maximal level can be provided in the written IEP document by including a description of what is known of the student's activities, interests, concerns, and goals along with a projection of how they might become the basis for stimulating the student to formulate goals and purposes. At the end of the school year or some other appropriate point in time, a description can be provided on how the goals and purposes formulated by the student became a part of his program.

Contextual and Circumstantial Considerations
Once again the student's intellectual maturity is an important determinant for how the criterion is met. As was stated for Criterion Two, the kind of independent activities the student is capable of engaging in will correspond to his intellectual maturity. For students of relatively low intellectual maturity these activities are likely to be of a sensory-motor and perceptual-motor nature and to be restricted to the immediate physical environment. For those of greater intellectual ability their independent activities are likely to be of a more symbolic and abstract nature and to extend beyond the immediate physical and social environment.

Furthermore, as was stated under Criterion One, with students of relatively low intellectual maturity, the teacher can expect that his role will largely be one of using his knowledge of development to interpret the student's spontaneous activities, tendencies, and wants and to translate them into significant educational activities and purposes. And with students of greater intellectual ability, who are able to communicate their goals and purposes and to engage in self-reflection, the teacher can cooperatively develop program goals and activities.

Finally, the remarks made under Criterion One with respect to emotional maturity apply here also. Depending on the emotional health and maturity of the student, the teacher's task will be largely one of interpretation and translation or of cooperative planning with the student and lightly guiding him.

Relationship of Criterion Three to Public Law 94-142 and to the EM Model
Since the meaning of Criterion Three is very close to that of Criterion One, it relates to Public Law 94-142 and to the EM model in much the same way that Criterion One does. It is the intent of Public Law 94-142 that the unique educational needs of each handicapped student are met. The EM model holds that the student's unique needs and individuality are expressed and revealed in his spontaneous activities, interests, and purposes. This view makes two, basic demands on the educational program: first, there must be made *room* (time and opportunity) in the program for the student to engage in independent activities of his choice and interest and second, the student's interests, concerns, and purposes must at least, in part, be the basis for developing his educational experiences.

Criterion IV:

Does the educational program and its activities generally have an expansive, as opposed to a restrictive, effect on the student; that is, does the program and activities generally have the effect of increasing both the capabilities and inclinations of the student for furthering his learning and growth?

Justification of the Criterion and Its Meaning
This criterion, although it cannot be found as an explicit requirement in PL 94-142, is nevertheless an indirect consequence of the Law. In its intention to provide *equal educational opportunity* for handicapped children, the Law implies its full support and acceptance of fundamental standards for determining whether or not experiences and activities are educative. In the section entitled "Comprehensive Wholes," it was asserted that one fundamental standard for judging experience as educative is that it be potentially expansive for the student with respect to furthering the growth of his knowledge, understanding, and appreciation, and that it should leave him readier than he was before the experience for further learning and growth. Dewey expressed the same standard in the following way:

> . . . the aim of education is to enable individuals to continue their education . . . the object and reward of learning is continued capacity for growth. (1916, p. 117)

A truly educative experience, then, tends to widen the individual's horizons, leaving him with greater knowledge and understanding, with more and better questions, and with the basis and inclination for further inquiry, learning, and exploration. Not only does the individual have greater skill or knowledge, but he is also in a better position than he was before the educational experience to further his development and growth. This means that the teacher should be constantly alert to how particular learning activities and tasks relate to cultural and social realities of wider significance. Wherever possible, the teacher should help the student to see the wider relationships of activities, to follow their lines of connection, and to expand his appreciation and knowledge of his world.

One major consequence of this standard is for how learning should proceed with respect to certain repetitive and narrow skills, information, and habits that are a part of both intellectual or academic-type accomplishments and of practical or social living activity patterns. Such learnings can easily have restrictive and limiting effects on the student, especially if there is a means-ends split or a reductionist approach to developing his educational program. That is, the building of narrow and repetitive skills and habits can easily take on a dominating role in the program when broader educational purposes are forgotten or ignored. These limiting effects can be prevented only if narrow habits, skills, and information are placed within their broader educational contexts and purposes.

As an example, let us take the familiar school activity of learning to read. There is no doubt that the ability to read is itself potentially expansive and educative for the student. Besides the sheer pleasure reading can bring, it can also open new areas of experience and broaden one's knowledge. Learning to read is certainly an example of the kind of activity that leaves him more ready than he previously was to further his growth and development. On the other hand, there are certain repetitive habits and skills which, although in themselves narrow rather than expansive, are nevertheless necessary toward achieving the expansive ability to read. The obvious danger is that the necessary repetitive habits and skills will dominate the program to the extent that the broader meaning and significance of reading is entirely lost. The teacher may be convinced that it is necessary to heavily emphasize such repetitiveness in the early stages of learning to read in the interest of eventually achieving the ends and benefits of "true" reading. However, the teacher may overlook the fact that these broader benefits are being lost as the student becomes immersed in the details of phonic sounds, word- attack skills, or study skills. The learner may come to view reading as an unpleasant and boring exercise, consisting primarily of habitual and repetitive activities, and having little connection with life's broader and more significant aspects. Thus, the total act of reading may become distorted for the student and it may never achieve for him that broader and more significant meaning that the teacher intends it to have.

How is the danger above to be avoided, given that narrow and repetitive learnings are ordinarily, at least to some extent, a necessary prerequisite to competence in reading? To avoid this danger, one must always keep in the forefront the total act of reading and its broader significance and purposes. One must also recognize that means and ends are intimately related, so that the means used in developing reading ability will determine the ultimate nature and meaning of reading for the student. The teacher, then, must use every opportunity, from the very beginning of learning to read, to show its broader significance to the student and to keep repetitive habits and skills in perspective. The teacher can achieve this from the very earliest, developmental stages of reading,by reading to and with the student, through experience stories, and by using techniques that bring out the practical and social uses of reading. In other words, the teacher insures that the program of reading activities never becomes so immersed in the repetitive habits and skills that the meaning and purpose of reading is lost. It is important from the very start that the student perceives reading as expansive and as a vehicle for extending his experiences and his knowledge of the world.

What has been stated above with respect to reading is, of course, equally applicable to the other subject areas of school learning. Every subject has its components of information and skills that are narrow and repetitive. These repetitive and narrow components should not become so isolated from the subject as a whole as to overwhelm the student and prevent him from appreciating and knowing its emancipatory and more widely significant features.

The same may be said for various narrow and repetitive behavior patterns which are a necessary part of practical and social living. These behavior patterns must be learned by anyone who hopes to live at a minimum level of harmony and efficiency in his society and they are a necessary prerequisite to higher level, more comprehensive, and more educative activities. Again, to avoid the danger of becoming overwhelmed by such narrow and repetitive patterns, they should often be placed within the wider contexts of naturally occurring social activities. In this way, the relationship of narrow skills and information to wider, more comprehensive, and more meaningful activities can be seen.

This problem and its solution can be viewed from another direction. PE methodologies, tending toward reductionism, are frequently tempted to treat basic, but narrowing, skills and facts as isolated tasks to be learned and mastered. There is the danger, then, of losing the wider meanings and significance inherent in the social and academic activities to which these skills and facts are basic or prerequisite. EM, on the other hand, tends to have a naturally built-in protection against the danger of losing wider meanings and significance because of its recognition of the reality of comprehensive wholes and its methods based upon this recognition. The recognition of comprehensive wholes compels one to continually place basic or prerequisite skills or facts into their wider and naturally occurring contexts.

Criterion V:

Is it made clear as to why, out of the total array of programs and services available, some are excluded or minimized and others are included or emphasized?

There should be a complete listing within the IEP of all available educational services and programs in the area and reasons should be provided for the selection or emphasis of particular ones from among all of those available.

No Minimal or Maximal Levels
There are no minimal or maximal levels for meeting this criterion. The criterion can be met only if there is a *complete* listing of available programs and services and if the reasons provided for selection and emphasis are *good* ones.

Relationship of Criterion Five to Public Law 94-142
The relationship of Criterion Five to the Law is indicated in the *Implementation of Part B of the Education of the Handicapped Act, Education of Handicapped Children, Rules and Regulations, Department of Health, Education and Welfare, Office of Education, Federal Register, Tuesday, August 23, 1977, Part II.*

This regulation insures that handicapped children (a) are provided with a "full educational opportunity", (b) "have available to them the variety of educational programs and services available to non-handicapped children", (c) "to the maximum extent appropriate are educated with children who are not handicapped", and (d) "have a continuum of alternative placements available" to meet their needs, the IEP should demonstrate, through a complete listing of available programs and services, and through providing reasons for those selected and emphasized, that there has been a thorough and careful consideration of all available opportunities.

Criterion VI:

Is there a clear statement of methodology and means for achieving short term objectives?

Minimal
There is a means or method identified and designated for each short term objective.

Maximal
There is a means or method identified and designated for each short term objective, and the means and methods are especially suited for achieving just those objectives for which they are designated.

Relationship of Criterion VI to Public Law 94-142
The Law states that the "individualized education program for each child must include . . .(a) statement of . . . short term instructional objectives . . ." (Implementation of Part B of the Education of the Handicapped Act, op. cit., p. 42491). Perhaps the following statement is so obvious that it does not need to be made; nevertheless: the development of objectives can only have meaning and purpose if there is a projected plan of means and methods for their achievement.

Criterion VII:

Is there a projected timing and sequencing of educational services and activities which (a) is built upon general, normative knowledge relevant to the particular student's needs and abilities, (b) is related to projected objectives and goals, and (c) accounts for available resources and personnel?

The timing and sequencing of educational services and activities should appear to be realistic and achieveable in light of the student's present status of abilities and needs and in light of the available resources and personnel. The timing and sequencing of activities and services should also appear to have a high potential for achieving the program's goals and objectives.

Minimal
Services and activities are placed into a sequence with approximate dates and time spans allotted to each.

Maximal
Services and activities are placed into a sequence with approximate dates and time spans allotted to each, and the sequence follows a developmental hierarchy such that earlier sequences are prerequisite to later ones.

Relationship of Criterion Seven to Public Law 94-142
The requirement for writing an IEP entails the notion of an intelligent and reasonable strategy or plan for achieving objectives and goals, the objectives and goals themselves intelligently and reasonably formulated. This notion, in turn, implies the ability and the requirement for sequentially planning activities and services so that earlier, prerequisite ones lead in a step-by-step fashion to later ones, with the total sequence of activities and services ultimately leading to program objectives and goals.

Criterion VIII:

Are there provisions made for obtaining assessment information and data directly from the student's performance and progress in order to (a) determine the sequencing and timing of educational services and activities, (b) determine the appropriateness of services and activities currently provided the pupil, and (c) make revisions and modifications in the plan?

Minimal
There are monthly, summary recordings of the student's performance and progress, including deliberations with respect to the relationship of this assessment information to program development.

Maximal
There are ongoing, daily recordings of the pupil's performance and progress, including deliberations with respect to the relationship of this assessment information to program development.

Relationship of Criterion Eight to Public Law 94-142 and to the EM Model
In order to fulfill the requirement of the Law for a truly *individualized* educational program, the teacher must know not only the student's *initial* characteristics, performance levels, and abilities, but also the changes and growth in the student that occur as the program progresses. Formal testing alone cannot fully provide the teacher with the knowledge needed; there must also be continuous and daily, informal assessments, derived from ongoing teaching and learning (diagnostic teaching). There are primarily four limitations to formal testing. The first limitation is that formal testing can only occur selectively and infrequently. It would be impossible, as well as undesirable to even try, to formally test in *all* performance areas with enough frequency to continuously assess the student's progress and growth. Secondly, in formal testing only a *sampling* of tasks and items within a domain can be assessed so that we are always left with questions as to the adequacy of the sampling, not only in a general sense, but also with respect to the particular individual being tested and the particular educational program he has experienced. A third limitation is that there is always a degree of artificiality in formal testing. Finally, there are areas that are extremely difficult, if not impossible, to get at through formal testing such as the individual's emotional and social characteristics, his initiative, his ability to persist and to deal with frustration, his reliability, and so on. For these reasons, formal assessment can be considered only a supplement to direct, continuous assessments and evaluations. Such direct and continuous assessment is derived from ongoing teaching and learning which exhibits the full range of the student's characteristics, performance, and abilities in a "natural" setting.

Turning now to the EM model, this approach gives full recognition to the reality of growth, change, and emergence of the new. The student can develop new characteristics, interests and purposes; the teacher's understanding and insight into the student's needs or characteristics can develop and change; and the educational program can take new and unexpected turns. All this implies an ongoing and continuous evaluation of teaching and learning, including the progress and performance of the student.

CHAPTER V: CRITERIA FOR DETERMINING THE QUALITY OF PROCEDURES UNDERTAKEN BY LEAS TO DEVELOP, REVIEW AND REVISE INDIVIDUALIZED EDUCATION PROGRAMS

Criterion I:

Are there procedures for determining that special and appropriate programs and services have been made available to all handicapped children in the LEA?

Minimal
A determination is made that all known and identified handicapped children in the LEA have IEPs with programs and services spelled out for them.

Maximal
A determination is made that all known and identified handicapped children in the LEA have IEPs with spelled out programs and services that have been selected as being most appropriate from among those available in the LEA.

Here, there must be a requirement by the LEA that the IEP include a justification for the selection of certain available services and programs over others that appear on their face to be nearly as adequate, or even more adequate. There should be a listing and description of all services and programs in the LEA made available for all IEP meetings.

Relationship of Criterion One to Public Law 94-142
The Law states that a "free appropriate public education" and "full educational opportunity" is to be made available to all handicapped children (Implementation of Part B of the Education of the Handicapped Act, op. cit., Sections 121a.304 and 121a.306, p. 42488).

Criterion II:

Are there periodic reviews and evaluations of IEPs?

Minimal
There are annual meetings in which IEPs are reviewed, evaluated, and modified based on (a) a record of the child's progress during the year, and (b) a recent medical, psychological, and educational assessment of the child.

Maximal
There is evidence that review and evaluation is a *continuous* and ongoing process in that:

> a. There are periodic assessments and continuous recordings of the child's progress and activities which form the basis for minor program revisions.
> b. Full IEP meetings are arranged whenever major revisions in the child's program are deemed necessary.

Major And Minor Program Revisions.
One way to distinguish between major and minor program revisions is through objectives and goals. Minor changes in program can be designated as those requiring *no more* than daily or weekly changes in program objectives. Major changes, on the other hand, can be designated as those requiring changes in at least *monthly* program objectives or goals. Changes in monthly or annual objectives and goals ordinarily require substantial and major changes in program placement, content, or activities.

Relationship of Criterion Two to Public Law 94-142
The Law includes the following regulation:

> **Each public agency shall initiate and conduct meetings to periodically review each child's individualized education program and, if appropriate, revise its provisions. A meeting must be held for this purpose at least once a year. (Implementation of Part B of the Education of the Handicapped Act, op. cit., Section 121a.343(d), p. 42490).**

Criterion III:

Does the LEA formally provide time for the teacher to participate in IEP meetings and to develop, review, and revise IEPs and to participate in IEP meetings?

Minimal
Time is formally made available on an annual basis for teachers of handicapped children to develop, review and revise IEPs and to participate in IEP meetings.

Maximal
The LEA has developed a formal procedure whereby teachers of handicapped children can request to be relieved of ongoing teaching responsibilities whenever they find it necessary to make major reevaluations and revisions (see under (2) above for identifying *major* revisions) in the child's IEP and to arrange for an IEP meeting.

Contextual or Circumstantial Qualifications

Certain LEAs may be limited in their resources and in their ability to make sufficient time available to teachers for planning and meetings. On the other hand, another kind of caution must be kept in mind; if we are serious in our demands that teachers do their part in fulfilling the intent and spirit of this provision of the federal law, then we would be hypocritical if we did little or nothing to make time available for planning and meetings.

Relationship of Criterion Three to Public Law 94-142

Same as for Criterion Two above.

Criterion IV:

Is assessment and diagnostic information used in developing, revising, and evaluating IEPs?

Minimal

Information on the pupil's performance levels, his characteristics, and his problems are made available to all participants in IEP meetings.

Medial

Objective, recorded data, including the results of informal, standardized, criterion-referenced, and norm-referenced scales and tests are made available to all participants in IEP meetings.

Maximal

Objective, recorded data as described in *medial* above is included, and in addition, interpretative descriptions are available which bring into focus the handicapped child's special characteristics, needs, and problems, his current progress, and changes in pattern or direction of activities, behaviors, and growth. The diagnostic and assessment data should include medical and psychological areas as well as educational areas.

Relationship of Criteria Four to Public Law 94-142

The Law states with respect to evaluation procedures that each handicapped child should be:

> . . assessed in all areas related to the suspected disability, including, where appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities. (Implementation of Part B of the Education of the Handicapped Act, op. cit., Section 121a.532, pp. 442496-442497).

Criterion V:

Has each designated member (the LEA representative, the teacher, the parent or guardian, and where appropriate, the child) participated in IEP meetings?

Minimal
Each designated member attends IEP meetings.

Medial
Each designated member attends IEP meetings and reaches agreement on the IEP, its revision, or its evaluation.

Maximal
Each designated member attends IEP meetings, reaches agreement, and actively contributes to the development, revision, or evaluation of the IEP.

Contextual or Circumstantial Considerations
There will be instances when the handicapped child either is unwilling or is incapable because of maturity, intelligence, or understanding to actively participate in IEP meetings. However, whenever the child can reflect upon and communicate his educational needs and goals and is willing to do so, he should be included as an active participant in the development, review, or revision of his own IEP. Similarly, there will be instances when the parent or guardian is unwilling to or is incapable of actively participating in IEP meetings. Again, whenever a parent is willing and capable, he or she should actively contribute to the development of his or her child's IEP.

Relationship of Criterion Five to Public Law 94-142
The Law stipulates that each IEP meeting must include:

> (1)A representative of the public agency, other than the child's teacher, who is qualified to provide, or supervise the provision of special education. (2) The child's teacher. (3) One or both of the child's parents . . . . (4) The child, where appropriate. (Implementation of Part B of the Education of the Handicapped Act, op. cit., Section 121a. 344, p. 42490).

Criterion VI:

Does the LEA provide guidelines for developing, reviewing, and revising IEPs?

Minimal
Simple forms are made available to IEP meeting participants outlining the components of the IEP, with at least a brief description of each component.

Maximal

Forms are made available to IEP meeting participants outlining the components of the IEP with a description, explanation, examples and criteria of adequacy for each component. The criteria of adequacy should account for major differences in handicapping conditions and for major variations in available services among different areas of the LEA.

Relationship of Criterion Six to Public Law 94-142

The Law states that:

> Each public agency is responsible for initiating and conducting meetings for the purpose of developing, reviewing and revising a handicapped child's individualized education program. (Implementation of Part B of the Education of the Handicapped Act, op. cit., Section 121a. 343, p. 42490).

It is evident that if this provision of the Law is to be satisfied, the LEA must provide guidelines to those who will have the task of developing, reviewing, and revising IEPs.

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SECTION III

The Individualized Educational Program (IEP) As a Vehicle for Delivery of Special Education and Related Services to Handicapped Children

Hill M. Walker

WALKER, HILL M. Dr. Walker is Professor of Special Education at the University of Oregon in Eugene, Oregon and Director of the Center at Oregon for Research in the Behavioral Education of the Handicapped (CORBEH), a research and development center funded by the Bureau of Education for the Handicapped, U.S. Office of Education. He received his doctorate in Special Education from the University of Oregon in 1967. His major research interests include: the identification and remediation of behavior disorders in children; problems in the delivery of children's services within the educational mainstream; and the generalization/maintenance of treatment effects. Dr. Walker has published extensively in the areas of classroom behavior management, identification/screening procedures, token reinforcement procedures, and the generalization and maintenance of treatment effects. He has conducted numerous workshops and training insitutes in the last 10 years designed to teach participants effective behavior management skills. He has served as a member of the Board of Editors of the Journal of Applied Behavior Analysis, Council for Exceptional Children, American Association for the Advancement of Science and the Oregon Psychological Association.

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INTRODUCTION

BEH guidelines for preparing IEP position papers indicate that the primary goal of this activity is the development of specific *criteria* thatat LEAs can use in measuring effective implementation of the IEP provision of P.L. 94-142. A gradient of implementation achievement or progress has been defined in the guidelines with one end of the continuum designated as conformance with the *letter* of the IEP legislation and the other designated as a full achievement of the *intent* or *spirit* of the law. Meeting the letter of the law is viewed as minimally acceptable practice while achieving the spirit or intent of the law is seen as exemplary practice, consistent with the ultimate mandated goals of P.L. 94-142.

The position papers are to develop criteria for evaluating the implementation progress of LEAs in terms of: (1) the quality of procedures used to develop, review and revise IEPs and (2) the quality of IEP documents produced by the congressionally mandated planning process.

The position paper developed by the author, addresses a third area not dealt with either in the BEH guidelines or by P.L. 94-142 legislation, e.g., the processes and procedures used to achieve IEP goals and objectives. That is, what are the instructional strategies, teaching techniques and implementation procedures that will result in an effective and successful application of the IEP document, e.g., specific processes and procedures used to achieve IEP goals and objectives.

Bateman (1977) notes that the P.L. 94-142 legislation mandates, in great detail, both the form and administrative structure of an IEP, e.g., goals, objectives, services, placements, review procedures and so forth but is conspicuously silent with respect to learner outcomes and the teaching procedures used to achieve them. While the IEP can in no way be considered a legally binding contract upon either regular or special educators, it is clearly intended to improve educational services to handicapped children by (a) individually tailoring services to a handicapped child's needs and (b) involving a variety of perspectives and professional inputs, including that of the child's parents, in the development of an effective educational program. These provisions may be a necessary but *not sufficient set of conditions for insuring that high quality educational services are* delivered to handicapped children. It is the author's opinion that no matter how well designed an instructional plan for a given handicapped child, the quality of services ultimately delivered will be heavily mediated by such variables as (a) the technical competence and skills of the professional personnel providing the services (b) the instructional strategies, teaching techniques and implementation procedures selected for achieving objectives, (c) the quality of materials chosen, (d) the child's motivational level, (e) the teacher and/or service provider's attitudes toward and general evaluation of the limiting properties of a child's handicapping condition(s) and so forth. Failure to consider the influence of these variables upon IEP development and implementation processes could have a deleterious effect upon achievement of the stated goals of the IEP legislation.

Intensive planning and direct supervision of the implementation process is a neglected area in the IEP legislation. Careful adherence to certain guidelines and standards of practice in the implementation process will often spell the difference between success and failure of even the most carefully planned educational program. Bateman (1977) makes a persuasive case for incorporating the principles and practices of prescriptive teaching into the planning and implementation components of the IEP process. Perhaps future followup legislation to P.L. 94-142 will systematically address the quality and adequacy of procedures used to achieve stated IEP goals and objectives.

The present paper will focus on the tasks of establishing *qualitative* standards of IEP development and implementation that will correspond to the letter versus the spirit of the law. No attempt will be made to systematically define intermediate units or indicators of quality on this continuum. Contrasting standards and practices will be presented and discussed for each of the three major focus areas addressed by the paper. These are (1) procedures for developing IEPs, (2) the IEP document and, (3) implementation practices and processes. A chapter will be devoted to each of these focus areas. A list of best practice standards will be presented for the reader's convenience at the end of chapters dealing with each of these focus areas.

In addition, there are six general issues affecting IEP development (and implementation) which the guidelines specify must be addressed in position papers. These are (1) the interrelationships of stipulated services, (2) changes in implementation over time, (3) contextual influences on implementation, (4) variations in implementation approaches, (5) relationship of criteria to assessment methodologies and, (6) definition of terms. Each of these issues will be addressed and dealt with in the three major focus areas of the paper as is appropriate.

The paper contains five chapters, including one each on the three major focus areas described above. The introductory chapter of the paper defines, characterizes and discusses the role of the IEP as a vehicle for the delivery of high quality services to handicapped children. Issues such as perspectives on the IEP process, areas of educational practice affected by the IEP provision, and constraining forces affecting implementation are also discussed. Finally IEP processes corresponding to the *letter* and the *spirit* of the law are contrasted and discussed in terms of their respective impacts upon current educational practices.

The final chapter of the paper presents conclusions and implications for educational practice. Recommendations for best practice and problem areas to avoid are presented for the reader's consideration.

It is intended that the material in this paper will be of service to LEAs in the development of guidelines and standards for judging the quality of IEP implementation. It is also intended that the material will be of value in the process of achieving specific goals and objectives contained in completed IEP documents. Hopefully the material on implementation processes in chapter four will provide useful technical assistance to LEA's in this task.

The IEP requirement of P.L. 94-142 presents both a powerful challenge and a significant opportunity to LEA's in the systematic improvement of educational services to handicapped children. The extent to which the spirit of the law is achieved will be a measure of the response of regular and special educators to this challenge.

CHAPTER I: ROLE AND FUNCTIONS OF THE IEP IN THE DELIVERY OF EDUCATIONAL SERVICES

Chapter Overview

This chapter begins with a definition and brief characterization of the IEP provision of P.L. 94-142. Next differing perspectives on the IEP are discussed in terms of their potential impact on educational practice as well as their potential for generating conflict. Congressional mandates relating to the IEP and educational constraints affecting their implementation are reviewed next. Finally, IEP planning and development processes corresponding to the *letter* versus the *spirit* of the law are contrasted and their implications for educational practice discussed.

The IEP Defined

The IEP provision of P.L. 94-142 formalizes the planning processes leading to the development of an individually tailored special education program for a handicapped child and provides a structure for the delivery and review of educational and related services contained in the plan. An IEP refers to a written document developed in a meeting or planning conference attended by (1) a representative of the local educational agency or an intermediate educational unit who shall be qualified to provide or supervise the provision of, specially designed instruction to meet the unique needs of handicapped children, (2) the child's teacher, (3) the child's parent(s) or guardian and where appropriate, (4) the child. The IEP document must contain the following elements: (a) the child's present level(s) of educational performance, (b) annual performance goals, (c) short term instructional objectives for achieving the identified goals, (d) special education and related services to be provided, (e) the extent to which the child will be able to participate in regular educational programs, (f) the projected date for the initiation and anticipated duration of services made available, and (g) objective criteria, evaluation procedures and review schedules for determining, at least annually, whether instructional objectives are being achieved.

The IEP process and document together formalize the principle of individualization of instruction in a way that has not been heretofore realized. The IEP requirement is meant to insure that each handicapped child's needs will be systematically considered on an *individual* basis and that services will be made available to respond to those needs.

The principle of individualization of instruction asserts that children have both different styles and rates of learning and that both planning and instructional processes should consider the individual needs of children, (Bateman, 1977). For instruction to be maximally effective, individual child needs and differences should be taken into account in the teaching-learning process. There is a widely held belief that this is especially true for handicapped children.

Few educators would argue with this basic point of view. While the principle of individualization is widely acclaimed in the educational community, its general acceptance, as determined by the extent of its actual implementation, has been somewhat limited. This is no doubt, in part, a function of the work pressures currently impinging upon educators in serving both handicapped and nonhandicapped children. The sheer logistics, time and effort involved in truly individualizing instruction for all children are, at present, overwhelming.

Congress has chosen to mandate the individualization of instructional planning for all eligible handicapped children in an attempt to improve educational and related services delivered to them. "Paper compliance" with the IEP provision of

P.L. 94-142 however, will not in any way *guarantee* that a child's educational needs will be responded to adequately. However, congressional mandates do provide an administrative and legal structure which facilitates the achievement of this goal.

Administrative Versus Child Oriented Perspectives on the IEP

MacMillan, Jones and Meyer (1976) distinguish between an *administrative* perspective and a *child-oriented* perspective in relationship to the mainstreaming process. This same model can be applied to the role and functions of the IEP in educational practice. The administrative perspective is concerned with such factors as (1) developing a legally correct IEP, (2) cost, (3) number of children served, (4) insuring that administrative and bureaucratic guidelines are adhered to and (5) the avoidance of conflict with individuals in adversarial roles such as parents. The child oriented perspective, on the other hand, would be less concerned with legal, fiscal and administrative issues. Instead, the focus would be upon the quality of services delivered and the impact of programming upon the receiving handicapped child's achievement and adjustment. Factors such as cost and resources allocation, although real concerns, are usually considered in only an indirect manner in this type of evaluation.

An IEP developed from an administrative perspective would in all likelihood approach the planning process in terms of organizing currently available services to respond to the child's need rather than identifying all the child's service needs even though existing services may not be available to respond to some of the identified needs. The resulting IEP document would be essentially a record of service provided to achieve goals and objectives identified for the handicapped child and would fulfill the legal requirements necessary before services could be offered.

An IEP developed from a child oriented perspective would respond to the identified needs of the child independent of available services and the costs and resources necessary to provide them. An IEP of this nature would attempt to identify all those variables and factors that constrain a handicapped child's development. The child would be placed in contact with those services which directly address identified deficits and/or problem areas. Efforts would be made to develop or contract for essential therapeutic services not currently available. However, the document would include a listing of *all* the child's needs, not just those for which services are currently available.

If the IEP planning and implementation process is approached from a child oriented perspective, albeit with proper attention to the legal and administrative requirements of the IEP, it would appear to increase the probability that congressional goals resulting in the IEP provision of P.L. 94-142 will be achieved.

This perspective embodies all the properties of a true child advocacy function. Thus, the IEP document becomes a vehicle for advocating and developing the best available educational plan for a handicapped child, given the constraints imposed by available resources and expertise. If the IEP process is viewed simply as a complicated and time consuming legal procedure that must be executed before child services can be initiated, then its effectiveness in changing educational practice(s) in relation to handicapped children will be severely attenuated.

Potential Conflict Among Differing Perceptions of the IEP Role and Functions

The IEP process can serve a number of differing functions in school districts' attempts to provide for the needs of handicapped children. Morrissey and Safer (1977) note that perceived function of the IEP varies not only in terms of one's perspective on the process, e.g., child oriented versus administratively oriented but also as a function of administrative level or unit. These units would include the classroom, school, LEA and SEA (state education agency). The teacher's and principal's view of the IEP process might be quite different from that of LEA and SEA administrators due to (a) the nature of their respective roles in the service delivery process and (b) the potential impact of the IEP upon the execution of their roles. It seems likely that the perspectives of LEA and SEA administrators would be more legally and administratively oriented than child oriented. The situation would likely be reversed at the level of school principals and teachers. Morrissey and Safer (1977) suggest that such variance in perspective across administrative units can lead to conflicting interpretations and/or expectations with respect to personnel roles and responsibilities as well as to authority for development, implementation and evaluation of the IEP. They note that an effective accommodation of these perspectives must be achieved if IEPs are to achieve their goals and expectations.

While the situation Morrissey and Safer (1977) describe may occur in some instances, it does not appear to be an inevitable or even probable outcome. It is true that one's professional vantage point will powerfully mediate perspectives on the IEP process. However, the resulting differences in perspective do not necessarily have to lead to conflict. For example, administrative and child oriented perspectives on the IEP process are not necessarily incompatible positions which produce inevitable conflict among professionals. It is likely that many educators share both perspectives and see the important role that both vantage points have to play in educational practice. For instance, at the level of IEP planning and implementation, it is essential that a child oriented focus always be in evidence as opposed to administrative convenience. However, it is equally important that careful adherence to required legal and administrative procedures be maintained throughout the IEP planning and development process. It is also important that another largely administrative concern be attended to in this process, e.g., the efficient use of available services and the development of additional ones where appropriate and feasible. Ideally it seems that elements of both perspectives must be maintained if IEP goals and objectives are to be addressed effectively within the context of realistic educational practice.

Impact of the IEP Process Upon Areas of Educational Practice

The IEP has the potential to impact upon current educational practice in a number of significant ways. Zeller (1976) has identified four areas of educational practice or function upon which the IEP process can have a significant, positive impact. These are (1) programming, (2) management, (3) monitoring and evaluation and (4) system change.

Programming.

Programming refers to the provision of special educational and related services in responding to the needs of handicapped children. The IEP process, if implemented properly, can have a powerful impact upon this area of educational practice.

Zeller (1976) suggests that special education has been traditionally dominated by a categorical approach to programming for handicapped children. Such an approach implicitly assumes that handicapped children sharing the same label e.g., retarded or emotionally disturbed must also share a common etiology, a common handicapping condition and therefore common needs resulting in a common placement. This approach has tended to standardize programming efforts for handicapped children and has, in many instances, worked against the development of individualization efforts. This approach has also served administrative convenience in that available services can be delivered very easily to children sharing common labels and a common placement e.g., a special classroom. However, ease of delivery is not necessarily correlated with either quality of programming efforts or effectiveness of child outcomes resulting from such efforts.

The IEP concept changes the focus of educational programming from a categorical base to one based directly upon an assessment of a handicapped child's educational needs. Placement decisions must now be justified in terms of how the child's needs are best served by them.

The IEP provision of P.L. 94-142 has the potential to revolutionize and greatly improve programming efforts for handicapped children. If the congressional mandate is achieved, assessment and programming activities for handicapped children will become truly individualized and hopefully result in the delivery of the highest quality services available.

Management.
In the area of management, Zeller (1976) notes that the development of IEP's for a large number of handicapped children over time will make it possible for the LEAs to more precisely identify child service needs. That is, by inspecting IEPs it will be possible to identify the types of services required by x number of children in x type(s) of settings.

This information can greatly facilitate planning in terms of the allocation of existing resources and the need to develop new resources for providing services not currently available but indicated as needed. A systematic review of implemented IEPs also makes it possible to identify services that are (a) not effective generally, (b) not effective with certain types of problems and/or deficits or (c) that need to be altered to achieve effectiveness. Finally, this procedure would very precisely identify areas in which inservice training of regular and special educators is required.

Monitoring and Evaluation.
Although IEPs are *explicitly* not viewed by Congress as legally binding contracts where educators are held accountable if goals and objectives are not achieved, it is clear that Congress saw the IEP provision as a means of building in greater accountability into programming efforts for handicapped children. This is suggested by the IEP requirement which provides for the direct involvement of parents in the development, approval and review of the educational plan. This element builds in accountability pressures and insures that monitoring of the general effectiveness of implemented procedures and services will occur on a systematic basis (at least annually). If annual reviews show that such procedures and services are not effective in achieving stated goals and objectives, then informal inquiries are likely to be conducted as to why this is the case. As a result, individuals and the services they provide will be held accountable in ways they have not been before. These accountability pressures may stimulate the development and implementation of more effective assessment and/or educational procedures and services. At the very least, they should be instrumental in isolating services that are consistently ineffective. When this occurs, it is incumbent upon educators to either discontinue these services or to improve the way in which they are delivered.

Bateman (1977) suggests that, as a result of IEP requirements, educators will become more demanding of assessment instruments used as a basis for developing educational programs and of instructional materials, designed to teach specific skills. She notes that assessment instruments which do not yield teaching implications and materials that do not achieve their stated objectives will eventually be selected out and largely avoided by educators experiencing systematic accountability pressures. If these outcomes should occur, it would be a highly significant development for educational practice.

System Change.
Zeller (1976) observes that the IEP can be viewed as a system change mechanism — that is, a way of structuring human service *systems to move them in a* particular direction. The overall effect of the IEP is to move educational programming efforts for handicapped children toward greater *accountability* and *individualization.*

Zeller (1976) has identified three primary system changes produced by the IEP provision of P.L. 94-142. These are: (1) Educational environments will come to accommodate a much broader range of individual differences, (2) the distinction between regular education and special education will become less clear as special education becomes assimilated into the broad array of educational support services and (3) services rather than children will be labelled and categorized. It is highly probable that these system changes will be realized as the IEP provision becomes fully implemented. Their implications for handicapped children are, in the author's opinion, extremely positive.

There are no doubt other areas of positive impact upon educational practice accruing from implementation of IEPs. However, if the changes described above do occur, educational services delivered to handicapped children should show significant improvement in both quality and effectiveness.

Congressional Mandates Relating to the IEP and Constraints Affecting its Implementation in the Educational Setting

In reviewing the legislative history of P.L. 94-142, including the IEP provision, it is clear that Congress intended to revolutionize educational services to handicapped children. Congress viewed the IEP as the primary vehicle for achieving this goal. Congressional debate concerning the IEP provision of P.L. 94-142 clearly indicates that Congress regarded the IEP as an extremely important instrument in achieving its overall mandates with respect to handicapped children.

A number of requirements were built into the IEP provision of the law to move educators in the direction of consistently exemplary practice with respect to handicapped children. The more significant of these requirements include the following: (1) Requiring that the handicapped child's parents be provided the opportunity for involvement in the development, approval and review of the educational plan, (2) **Requiring** a child study team approach to planning for educational programs delivered to handicapped children, (3) Requiring a written document of an educational plan that serves as an informal mechanism for insuring accountability of educational personnel and the services they deliver and (4) Requiring that assessment and programming efforts for the handicapped child be individualized. By installing these requirements into the IEP provision of the law, Congress demonstrated a sophisticated awareness of the complexities involved in mandating changes in educational practice of the magnitude outlined in *P.L. 94-142*. Congress built in procedures designed to facilitate achievement of these changes.

For example, by mandating the direct involvement of parents in the planning and review of an educational plan for a handicapped child, Congress sought to take advantage of the potentially powerful advocacy role parents can play on behalf of their children. Congress also clearly believed that parents could contribute significantly to the development and implementation of an exemplary educational plan.

Requiring a child study team approach to the planning process was designed to bring a broad spectrum of expertise and view points to the development of an individualized plan. It also insured that individuals involved in the delivery, supervision and consumption of available services would be involved in this process.

The written IEP document provides a record of the planning process, a statement of mutually agreed upon goals and objectives, and indicates the services and resources to be allocated in carrying out the plan. Depending upon one's perspective, the document can also be viewed as a guide to instruction. As such, the IEP provides a very clear basis for accountability in relation to the plan implemented for a handicapped child.

Finally, mandating that both the planning process and the resulting plan for the handicapped child be individualized was an attempt by Congress to insure that the best educational practice be carried out in relation to providing for the needs of handicapped children. It was felt that an individually tailored educational plan would allow handicapped children to derive maximum benefit from services provided.

The rationale for these requirements and the structures established for their implementation are very sound. However, there are a number of educational constraints which can directly affect the extent to which mandated IEP goals and objectives are achieved. Any *significant* treatment of the IEP process and its implications for educational practice cannot ignore the potential role of these constraints.

Educational Constraints Placing Limitations Upon Achievement of Mandated IEP Goals and Functions

These educational constraints will have an impact in at least three major areas. These are: (1) Staffing, manpower and *time deficiencies of LEAs in relation to* implementation of the IEP provision. (2) Obstacles to meaningful involvement of parents in the IEP process and (3) Specification of overall responsibility for a handicapped child's educational program. Each of these impact areas is discussed below.

Staffing, Manpower and Time Deficiencies of LEAs in Relation to Implementation of the IEP Provision.

The IEP requirement has greatly increased the level of service to be given to handicapped children. The necessary planning and implementation activities that must be carried out for each individual child consume huge amounts of time for educators generally and especially for *teacher support personnel* e.g., specialists who provide diagnostic, evaluation and remediation services to children and their teachers. As a rule, there has been no corresponding increase in staffing and manpower capacities within LEAs to cope with these added work pressures.

Unless systematic steps are taken to respond to this situation, meaningful progress toward achievement of IEP goals and objectives may be seriously impeded. Indications are that special and regular educators are currently subsidizing the development of IEPs by investing significant amounts of their own time in this process. As laudable as this response is to the situation, it is only a partial solution. It is by no means sufficient given the magnitude of the problem.

The impact of intense work and time pressures impinging upon educational personnel can have a number of undesirable effects upon the process of delivering services to handicapped children. These effects include but are not limited to the following: (a) rationing of services, (b) pressures to limit referrals, (c) inadequate data gathering and assessment procedures, (d) routinization of the IEP planning process, (e) noninvolvement of parents in meaningful aspects of the IEP planning process, (f) failure to monitor the implementation process and to provide the necessary technical assistance and (g) slotting of handicapped children into existing services as opposed to development of new services as needed.

Many of these effects were dramatically illustrated in a comprehensive study of the implementation of *Chapter 766,* a highly innovative state special education law in Massachusetts. The Comprehensive Special Education Law of Massachusetts, Chapter 766, was passed by the legislature in 1972 and scheduled to take effect in 1974. The law was a precursor of P.L. 94-142 and was even more demanding of educators in some respects than is P.L. 94-142. Weatherly and

Lipsky (1977) conducted a thorough study of the law's implementation and studied intensively its impact upon educational practice in three school districts. The specific focus of the study was upon the effects of introducing innovative procedures into continuing educational practice. It examined state policy and objectives of the law against the realities of local implementation. The results are very instructive and point to potential problem areas in the implementation of P.L. 94-142.

Initially, the law created severe problems for local school districts. These included (1) inadequate guidelines for implementation, provided by the state, (2) exacerbation of tensions between regular and special educators, (3) enormous paperwork burdens, (4) parent challenges of educational processes and procedures and (5) significant increases in workloads for educational personnel charged with implementation responsibilities. Many of these problems could have been avoided or at least attenuated by more careful planning, the provision of additional resources and systematic preparation of educational staff for their new roles and responsibilities under the law.

However, a continuing problem with the law's effective implementation was the built in conflict between requirements for mass processing of children and legally mandated pressures to achieve individualization of diagnostic and programming efforts. Since the mass processing requirements were static and relatively inflexible, educational personnel tended to cope with the workload pressures by compromising on individualization procedures and quality of implementation efforts. This resulted in the outcomes described above in (a) through (g).

In the author's opinion, these are very unfortunate outcomes of legislation designed to significantly improve educational services for handicapped children. Chapter 766 is a more demanding law than 94-142 in terms of the legal requirements and administrative burdens it places upon LEAs. The implementation guidelines, available resources and timelines associated with P.L. 94-142 probably create fewer problems for LEAs than did the Massachusetts law. However, *all* of the undesirable outcomes noted above in (a) through (g) are possible with P.L. 94-142 implementation efforts. Achieving effective implementation of the IEP provision of the law while avoiding these outcomes will present a very significant challenge to educators.

Weatherly and Lispky (1977) describe two important factors affecting the extent to which new innovations such as the IEP are integrated effectively into educational practice. These are (1) an adequate funding base must be provided for new services to be developed and for responding to administrative and legal requirements and (2) school personnel must be prepared, both attitudinally and, in terms of technical skills, for their new roles and responsibilities. At present it is not clear to what extent these two conditions have been met in relation to

P.L. 94-142. Continuing experience with implemetnation of the law will provide more precise information on this issue.

Obstacles to meaningful involvement of parents in the IEP process.
Numerous constraints exist in the educational community in relation to the *meaningful* involvement of parents in the IEP process. These include the following: (a) pressures on educational personnel to avoid conflict with parents in the IEP process leading to complicated, costly and time consuming legal proceedings, (b) the educational level of parents, (c) hostility toward or fear by parents of school procedures and/or use of labels applied to their child including stigmas associated with various child placements, (e) the practice of blaming parents for their child's behavioral and/or learning problems, (f) use of educational jargon and technical language in describing the child's functioning and needs, (g) massive service pressures on special and regular educators leading to assessment of the child's needs and development of IEP's with no or minimal parent involvement, (h) lack of knowledge by parents regarding alternative placements and educational options leading to a willingness to bow to professional opinions. These are extremely powerful forces that can suppress the active and meaningful involvement of parents in the IEP process. Because of the traditionally adversarial, and sometimes antagonistic roles of schools and parents and given the intense work pressures LEAs [illegible] currently under with respect to P.L. 94-142, it is not surprising that such outcomes occur. However, they represent potentially severe impediments to achieving the goals of the IEP provision.

Weatherly and Lipskey's (1977) study provided some revealing insights as to how these constraints operate to limit and suppress parent involvement. For example, they noted that IEP planning meetings were usually dominated by educational specialists who often used technical jargon and professional language in describing the handicapped child's functioning. Parents were often at a disadvantage in this situation and were frequently intimidated by the professional authority and expertise of specialists.

The focus of these meetings was typically upon the child's deficiencies and a verification of them. This, in spite of the law's requirements that the planning process focus equally upon the child's strengths and weaknesses. The authors note that this process often absolved the teacher of responsibility and allowed the school to pressure parents into compliance with whatever plan was developed for the child. This did not occur in every instance; however its frequency was such that it was a definite cause for concern.

Teachers and parents both played a definitely secondary role to specialists and administrative personnel in decision making regarding the handicapped child. These personnel often displayed defensive reactions to the concerns of parents. The avoidance of conflict tended to dominate such planning meetings. Parents were clearly viewed as outside members of the team charged with developing an educational plan.

Finally, Weatherly and Lipsky (1977) suggest that the handicapped child and parents were often subtly blamed for the child's problems. Teachers were especially likely to do this in relation to the learning and disruptive behavioral problems of handicapped children. The authors suggest that teachers may have been motivated in this regard by a desire to fix blame and thereby relieve themselves of responsibility for the child's difficulties.

A review of selected state plans for implementation of P.L. 94-142 and the IEP provision indicates that the role of parents in the IEP process is viewed primarily as one of information giving and granting approval rather than decision making. Further, a recent survey of pupil planning teams in Connecticut with respect to the role of parents in planning and programming efforts indicates that schools see a very limited role for parents in this process (Yoshida, Fenton, Maxwell, and Kaufman, 1977).

It is understandable why LEAs would prefer to limit the role of parents in the child planning and programming process given the burdens it places upon them. However, Congress saw this as a basic right and privilege of parents and intended that they should have every opportunity to participate meaningfully in this process. Congressional debate on this issue indicates that parents were expected to play the following roles in the IEP process: (a) as significant providers of information in the planning process, (b) as decision makers in the selection of child programs and placements (c) as child advocates in a position to grant informed consent with respect to programming efforts and (d) as supportive partners of the school in the implementation process. At present, it appears that congressional intent in this area is not being realized.

Specification of Overall Responsibility for a Handicapped Child's Educational Program.

Acceptance of specific responsibility for educating handicapped children has been a vaguely defined issue over the years. Until recently, special education was viewed as largely having responsibility for handicapped children with regular educators responsible for nonhandicapped children. However P.L. 94-142 has produced strong pressures for regular educators to also accept responsibility for handicapped children with special education assuming a role of child advocate and provider of technical assistance to regular education. Clearly this state of affairs does not yet exist.

Regular educators, in many instances, have demonstrated considerable reluctance to accept responsibility for handicapped children. Special educators have encountered great difficulties in attempting to reintegrate children into regular classes especially if the handicapped child has significant learning and/or behavioral problems. In a similar vein, Weatherly and Lipsky (1977) noted in their study that a continuing problem was the tendency of regular teachers to shift responsibility to specialists for children referred to special education.

In the author's opinion, this is an extremely serious problem and has direct implications for both the implementation of IEPs and the quality of programming efforts. It seems apparent that the mandate of P.L. 94-142 is clearly for regular educators to accept ultimate responsibility in providing for the needs of the great majority of handicapped children with special educators providing technical assistance and support as needed. Special education can be a valuable resource to regular educators in this regard. At present, many regular educators continue to see specialists as having primary responsibility in this area while specialists view regular educators as having primary responsibility especially with the advent of P.L. 94-142. As a result, programming efforts for handicapped children continue to suffer from insufficient focus, coordination and accountability.

The basis for regular educators' continuing reluctance to accept responsibility for handicapped children are not explicitly obvious. However, the following factors are probably at least tangentially related: (1) a narrow range of tolerance for child learning and behavior problems by regular teachers, (2) reactivity to the work pressures involved in providing for a handicapped child's educational needs, (3) an aversion to depending upon specialists for technical assistance in managing a handicapped child's program (4) philosophical problems associated with concentrating services upon a handicapped child to the exclusion of regular students and (5) a lack of preparation and confidence in their ability to work effectively with the learning and behavioral problems of handicapped children. With the exception of No. 5 above, these are attitudinal problems that have a very powerful influence upon the way in which teachers respond to handicapped children and their needs. There are no easy or simple answers to the problems created by these attitudes.

Perhaps exposure to and positive experiences with the mainstreaming process will gradually soften teacher attitudes and LEAs to a greater receptivity to investing time and energy in providing for the needs of handicapped children. Inservice training focusing on preparing regular educators for their new roles vis-a-vis handicapped children should also be of great assistance in this regard.

The above constraints will have a definite impact upon the IEP provision of P.L. 94-142 and will clearly mediate the extent to which its goals and objectives are achieved. An explicit recognition of their existence and potential impact may assist LEAs in coping with them in the process of implementing the IEP provision of P.L. 94-142.

IEPs Meeting the Letter Versus the Letter and Spirit of the IEP Provision of P.L. 94-142

An IEP process that meets the letter of the law, e.g., "paper compliance" with the IEP provision and requirements, is relatively easy to define. However, one that meets both the letter *and* spirit of the law is subject to considerable subjective interpretation and judgement. Therefore, its characteristics are certainly open to question, debate and disagreement.

It should be noted also that an IEP process meeting both the letter and spirit of the law as presented here, may exceed the available resources and services that can be delivered in some LEAs. Staffing and manpower needs would likely also be insufficient to implement this IEP process in many LEAs. It is possible that effective implementation of the IEP provision in some LEAs will require a substantially greater allocation of funds by federal and state sources than is currently projected under P.L. 94-142.

An IEP Meeting the Letter of the Law

In the author's estimation, an IEP corresponding the letter of the law has the following characteristics: (1) provides "paper compliance" with the IEP provision requirements, (2) is an educational plan tailored individually to a handicapped child's needs and designates services that will be provided, (3) provides a record of strategies to be used in achieving IEP goals and objectives, (4) provides a record of resources to be allocated in the delivery of services and (5) is a legal document that must be completed before other than temporary special education services can be made available to a handicapped child.

Development and implementation of the plan is viewed as a dynamic process which addresses all of the required elements of IEP process as specified in the final regulations. However this process does not specify qualitative standards to be adhered to in addressing each element — only that they be attended to in the planning process.

An IEP Corresponding to the Letter and Spirit of the Law

An IEP process meeting the letter and spirit of the law would incorporate all the characteristics described above corresponding to the letter of the law and in addition, would: (1) be a comprehensive educational plan based upon a thorough diagnostic assessment of the handicapped child's functioning, (2) would contain a statement of the child's current and projected needs, (3) would serve as a guide to instruction, (4) would produce a total service plan containing guidelines and procedures for implementation and instruction and (5) would contain those additional IEP elements written into the proposed regulations but eliminated from the final regulations e.g., specifying media and materials to be used, the type of physical education program to be provided, the individuals responsible for implementing the plan and finally justifying the placement decision.

An IEP process meeting the letter and spirit of the law should specify *all* of a handicapped child's service needs (proposed regulations) rather than simply listing the services to be provided (final regulations). There has been some confusion over the correct interpretation of this issue. However, Martin (1977) in an informal letter to chief state school officers published in *Education of the Handicapped,* recently indicated that in spite of the language differences between the proposed and final regulations on this issue, LEAs are still obligated to specify a handicapped child's needs even though services may not be available to respond to all of them.

The major differences between IEPs meeting the letter versus the letter and spirit of the law would be that the latter IEP process represents a total service approach where an implementation/instructional plan (IIP) is developed for each annual goal listed on the IEP document thus providing a specification of strategies to be used in achieving instructional objectives for each annual goal. In other words, this IEP process goes beyond the level of individualized and careful planning and attends in considerable detail to the teaching-implementation process. This is a crucial difference in the two processes. The latter process is likely to have a significantly greater impact in achieving the ultimate criterion of a good IEP, i.e., the degree to which it facilitates student progress.

Finally, this IEP process would not be limited to one year planning increments. The child's needs, educational programming and related services required and estimates of the child's progress would be considered over multiple years so as to build greater continuity into the planning and implementation process.

Implementation of these respective IEP processes are likely to have very different effects upon the educational practice of LEAs. The effects of IEP processes meeting the letter versus the letter *and* spirit of the law would be reflected in the following areas: (1) investment of time and resources,(2) organizational and planning functions, (3) thoroughness of assessment, (4) group process and decision making, (5) quality of services delivered and monitored over time and (6) student adjustment and achievement. Achievement of the letter *and* spirit IEP process will require the investment of a significantly greater level of resources and services. The approach to assessment, planning, decision making and program monitoring in this process is designed to produce an exemplary educational program that will have the maximum possible impact upon a handicapped child's progress. This will require the organization and coordination of extensive staff expertise in the planning, decision making and implementation processes. However, the benefits accruing to the handicapped child should be well worth such an investment.

The next two chapters will discuss how these two IEP processes will differ in terms of planning activities and the final IEP document. As mentioned earlier, chapter four will focus on implementation procedures and chapter five on educational implications of the IEP process and major problem areas to avoid in its implementation.

Concluding Statement

The perspectives and constraints discussed in this chapter will have a powerful impact upon the IEP process and its implementation. They are an integral part of the educational community and impinge directly upon daily educational practice.

Many of them are antithetical to the goals and objectives of the IEP process. As such, educators are faced with a significant challenge in achieving the mandated goals and objectives of the IEP process within this context. Time and experience will reveal our success in this task.

An IEP process meeting the letter of the law achieves minimally acceptable practice within the limitations imposed by these contextual factors. An IEP process meeting the letter and spirit of the law achieves exemplary practice and assumes that limitations presented by these factors can be eventually eliminated or severely attenuated.

CHAPTER II: THE QUALITY OF PROCEDURES USED TO DEVELOP, REVIEW AND REVISE INDIVIDUALIZED EDUCATION PROGRAMS

Chapter Overview

This chapter contrasts planning procedures and processes corresponding to the letter versus the letter and spirit of the IEP legislation. In the "letter of the law" IEP process, necessary steps are presented and reviewed which will insure the following: (1) "paper compliance", (2) legal and administrative correctness and (3) minimally acceptable practice. The "letter *and* spirit" of the law process insures all of the above and in addition presents processes, procedures and qualitative standards which, in the author's estimation, will achieve the true spirit of the IEP provision.

An IEP Planning Process Meeting the Letter of the Law

The IEP legislation states that an IEP must be developed for each identified handicapped child who meets state and local eligibility criteria. The law is relatively unspecific about the procedures for carrying out this task other than to designate the components an IEP must address and the minimum personnel who must participate, or be given an opportunity to participate, in the development of the plan.

The IEP process must, by law, address seven elements (see Chapter I) (a) through (g) and produce a written document which (1) documents the planning process and (2) represents an individualized educational program for the handicapped child. The document must be developed in a meeting attended by: (1) an LEA representative, other than the child's teacher, who is qualified to provide or supervise the provision of special education, (2) the child's teacher, (3) one or both of the child's parents, (4) the child, where appropriate, and (5) other individuals at the discretion of the parent or agency. For a handicapped child who has been evaluated for the first time, the LEA must insure that (a) a member of the evaluation team participates in the meeting or (b) that the representative of the public agency, the child's teacher or some other person is present at the meeting, who is knowledgeable about the evaluation procedures used with the child and is familiar with the results of the evaluation.

Procedures used to develop an IEP document which meets the letter of the law, i.e., satisfies the above requirements, would presumably be satisfactory in a legal, administrative sense. However, they might be quite inadequate in producing an exemplary, or even satisfactory, educational plan that would have an impact upon a handicapped child's adjustment and achievement.

In spite of the law's silence regarding planning processes, it is obvious that considerable information gathering, assessment, decision making and plannig activities must occur in order to produce an IEP that is even minimally acceptable. A review of state plans outlining implementation procedures and guidelines for P.L. 94-142 reveals that states have given considerable thought to this problem and have taken steps to respond to it. There is a surprising degree of similarity across states in terms of procedural aspects of these plans. It would appear that at least the following nine steps would have to be addressed in order to produce an IEP corresponding to the letter of the law. These are: (1) Initial identification procedures, (2) Referral, (3) Assessment and case review procedures, (4) Determining eligibility, (5) Scheduling and conducting a child study team meeting to develop an IEP, (6) Developing a plan which addresses all components of the IEP, (7) Plan implemented by all parties involved, (8) Plan reviewed annually and (9) Plan revised based on annual review or a new plan developed if indicated.

Initial Identification Procedures.

P.L. 94-142 requires that LEAs initiate procedures to locate eligible handicapped children who are currently not receiving services ar are under-served by special education. Specific procedures for achieving this goal are not mandated. LEAs must simply demonstrate that they have engaged in good faith efforts to respond to this mandate.

At the very least this requirement would suggest that LEAs should (1) survey, on a systematic basis, the mainstream population of children within its jurisdiction to identify potentially eligible handicapped children and (2) to review all eligible handicapped children currently receiving services for the purpose of determining whether they are being underserved by special education.

There are a variety of approaches to this problem. The primary identification sources for potentially handicapped children would include (1) the classroom teacher, (2) the school counselor, (3) the school principal and (4) the child's parents. Minimally acceptable practice would involve contacting each of these sources and sensitizing each to the issue of identifying potentially eligible handicapped children. Identification criteria and child characteristics should be specified in the contact as should procedures to be followed if a given identification source wishes to refer a potentially eligible child via a carefully prepared memorandum or letter with followup telephone or in person contacts as necessary.

In no instance should pressures be applied to limit referrals because of lack of available resources and services or because of the work pressures they may generate. In fact, national estimates of incidence figures within each disability category should be used as general guidelines for estimating the expected frequency of handicapped children in LEAs. These figures shuuld be prorated on the basis of local school population figures (e.g., % of school population) to obtain realistic estimates of the number of handicapped children by category. These figures should be adopted as general target goals for identification unless there is reason to believe that nationally based estimates would not apply to the LEA involved, (Neubauer, Bardsley & Franklin, 1977).

Achieving the second goal, e.g., determining whether a child is currently underserved, is a more difficult but perhaps equally important task. As a starting point, all providers of special education services should be contacted to determine the extent ofthe problem. If this activity indicates eligible children are currently being underserved, the LEA must develop criteria for determining when and to what extent a given child is being underserved. A task force of special educators with representation from regular education, could be formed to address this problem. Such a task force should also consider how to accurately identify such children and what procedures should be initiated to respond to the fact of underservice when it occurs. At a minimum, special educators should be asked to identify those children who in their estimation could make significantly greater progress than they currently are, were additional essential services available. Evaluation and verification criteria could then be applied to determine the accuracy of estimates provided by special educators.

Implementation of these two sets of procedures would provide an easily documentable record of the LEA's attempts to respond to P.L. 94-142 mandates in this area. Given a reasonable effort in executing these tasks, the letter of the law in this area would appear to be met.

Referral.

A set of procedures needs to be established in this area by LEAs to achieve the following objectives: (1) to give every potentially handicapped child an *equal* opportunity to be referred to special education in order to determine eligibility and need for services; (2) to make maximum cost effective use of available resources in the areas of assessment, information gathering, diagnosis and planning; and (3) to put noneligible children into contact with non-special education services for coping with problems and needs precipitating the initial contact.

A formal referral to special education can result in the consumption of extensive staff time and resources. Children initially identified by referral sources will, in many instances, not be eligible for special education services. A procedure should be established to determine when a referral to special education is warranted and when it is appropriate to (a) put the child in contact with nonspecial education related services, (b) to offer recommendations and/or services in the child's home school as a first step in responding to the problem or (c) refer the child back to available services within the home school such as counselling. In many cases, satisfactory solutions to concerns of the referral source can be developed by this procedure – short of referral to special education. In the author's estimation, this procedure has the potential to produce a very cost effective use of staff resources and expertise while still meeting the letter of the law concerning access to special education services.

The form which this procedure assumes would likely vary from LEA to LEA. However, it is recommended that a procedure be established wherein any potential referral is routed through a home school source, e.g., counselor, principal or school committee as a first step before contact with a centralized special education service within the LEA is made. This would insure that resources and capabilities of the home school had been considered and possibly applied before a referral to special education is initiated. This procedure would also be used to determine when a child should be referred for testing and evaluation not available within the home school. However, care should be taken that this procedure does not prevent the referral of handicapped children to a centralized district service where appropriate. This might occur in situations where the home school has special education classes or services available.

The LEA's special education service must also have an established procedure for determining when a referral to special education is indicated and when alternative options should be considered. A number of LEAs have designated case managers for this role who are usually educational specialists such as school psychologists, resource personnel, teacher consultants and so forth. These individuals are knowledgeable concerning (a) handicapped children and their characteristics, (b) available services within the LEA including both special education and non special education services, (c) placement options and (d) eligibility requirements. Case managers would make a decision concerning the handicapped child and the next steps to be followed after consulting all involved personnel and carrying out the necessary information gathering activities, including testing, where necessary for making this decision. This decision process could also be executed by a committee of case managers or by the special education director of the LEA with recommendations provided by case managers based on preliminary evaluation of the case. It is important that case managers be involved at the *school* level to assure that handicapped children who are eligible for referral to special education actually get referred.

Ideally, information gathering activities of case managers should be structured and standardized to the maximum extent possible. This would help insure that procedures and decision making would not be overly dependent upon the skills, competence and particular approach of individual case managers. However, this would not be a letter of the law requirement.

Assessment and Case Review Procedures.

In order to determine a child's eligibility for special education, it is usually necessary to obtain information related to the area(s) of suspected disability via assessment and case or records review procedures. The quality of decision making with respect to determining child eligibility is directly related to the thoroughness and quality with which these procedures are carried out. The law is concerned that every child who is declared eligible is in fact eligible based upon a firm knowledge foundation and a clear, unbiased application of eligibility criteria.

The law mandates both structures and guidelines to be followed in the area of assessment and evaluation, e.g., non biased assessments, obtaining prior parental consent and insuring that decisions about the handicapped child are not based on information produced by only one assessment instrument or procedure. Requirements corresponding to the letter of the law are very specific in this component of P.L. 94-142 and should be followed explicitly by LEAs.

This level of assessment and information gathering is only tangentially related to the IEP. That is, it determines whether the child is eligible for special education and thereby requires development of an IEP. The letter of the law does not address this issue, but in the author's opinion, this information *should not* be used as the only basis for developing an IEP except in very unusual circumstances. Information gathered for the purpose of determining eligibility would usually not be sufficient for planning an individualized educational program.

Determining Eligibility.
The IEP provision of P.L. 94-142 does not address this issue directly. It simply notes that all eligible handicapped children should have an IEP developed for them.

Eligibility criteria and procedures for determining eligibility vary from SEA to SEA and from LEA to LEA. A great deal of arbitrary judgement is usually exercised in determining eligibility due to the lack of specificity contained in definitions of handicapping conditions and variance in acceptable procedures for interpreting and applying eligibility criteria. LEAs should attempt to develop eligibility decision processes that (a) reduce arbitrary judgement to an absolute minimum, (b) are standardized to the maximum extent possible, (c) are supported by a firm information base and (d) produce replicable effects over time.

Scheduling and Conducting a Child Study Team Meeting to Develop an IEP.
As the final regulations specify only one meeting of a child study team is required for the purpose of developing an IEP. However, given the complexity of this task and the breadth of information required to carry it out, it is difficult to see how the letter of the law would be met by an IEP developed and produced within a single meeting.

A review of state plans for the implementation of P.L. 94-142 reveals that a series of meetings are usually held to (a) discuss the child and his/her problems, (b) review information, (c) discuss placements and (d) develop a tentative IEP. The actual IEP meeting is then held to formalize the educational plan, to justify it and to obtain parental consent. The role of parents in this process is usually seen as that of giving information and granting approval of the IEP.

A procedure involving either a single meeting or multiple meetings for the purpose of developing an IEP meet the letter of the law. The form, structure, and extent of parent involvement in this process is not mandated — only that parents be involved if possible. Unfortunately, the requirement of parent approval of the IEP sometimes dictates the approach of LEAs to the IEP development process, e.g., the planning process is geared to obtaining parent approval rather than to developing an exemplary educational program tailored to a handicapped child's unique needs.

P.L. 94-142 does not specify guidelines or requirements relating to the conduct of an IEP meeting. However, the way in which this meeting is conducted has a great deal to do with the type and quality of educational program developed. In the author's opinion, minimum practice with respect to this meeting would include insuring the following: (a) that the child's parents and teacher(s) are not relegated to secondary status roles in this meeting; (b) that parents and teachers are allowed to participate in the planning process as providers of information and as significant decision makers; and (c) that the focus of the meeting be upon the child's needs rather than upon administrative convenience and/or avoidance of conflict.

The information used to develop an IEP is also not addressed by the IEP provision of P.L. 94-142. The provision states that the child's current level of educational performance will be described. The IEP legislation assumes but does not require that this specific information will be used in developing the IEP. In the author's opinion, this information should not be used as the only basis for developing an IEP. As a rule, information of this type will have only limited direct implications for development of an individualized educational plan. Diagnostic information on specific deficits is necessary for effective program development.

The IEP provision does not specifically require that evaluation or remedial specialists attend the meeting and participate in the planning process, nor does it require that implementers of the plan be present. However, it is difficult to see how an adequate IEP could be developed without the active participation of these individuals.

Developing a Plan Which Addresses All Components of the IEP.

The law requires that each element of the IEP be addressed, but does not specify qualitative standards to be adhered to in this process. There are no minimum standards with which each element must be addressed.

As noted earlier, the language of the IEP does not *require* that all the child's needs be identified — only that the document specify services to be provided. This would appear to give LEAs considerable latitude in responding to the unique programming needs of handicapped children. However, as Martin (1977) has indicated, this should not be the case — the child's needs must still be identified even though services cannot be provided for all identified needs. Presumably, if child needs were identified which required services not available, efforts would be made to contract for such services or to develop new ones.

Plan Implemented by All Parties Involved.

The IEP provision has very little to say about the implementation process. In the author's opinion, P.L. 94-142's failure to address this issue is a serious weakness and a potential threat to effective achievement of IEP goals and objectives. There are no letter of the law requirements relating to implementation of the IEP. However, its implementation is assumed and *must occur* in order to provide a basis for annual review.

Plan Reviewed Annually. The law specifies that the IEP be reviewed annually. This review schedule makes it possible to determine if the educational program worked or did not work. It is much too infrequent to be used for the purpose of revising a program in order to respond to a child's instructional or programming needs. However, it does not meet the letter of the law.

Plan Revised Based on Annual Review or a New Plan Developed if Indicated. It is certainly desirable that a handicapped child's program be reviewed at least annually. However, as noted, this is usually a summative review of the extent to which the program was successful. Regularly scheduled formative reviews would be necessary in order to revise a program so that it could optimally address a child's needs. As a result of the annual review, the options are to continue the program as is, to eliminate it or to revise it. If these procedures are adhered to, the letter of the law will be met.

The sequence of activities discussed and reviewed above reflect primarily administrative concerns in satisfying the letter of the IEP legislation. The implementation of IEP documents produced via this process would likely vary considerably in quality and effectiveness. Services delivered would likely also vary considerably. The sequence of activities outlined below would reflect a child-oriented perspective and would meet both the letter and spirit of the law.

An IEP Process Meeting the Letter and Spirit of the Law. As noted earlier, the focus of this IEP process would be primarily child oriented but would also satisfy all legal and administrative requirements associated with the IEP process. This process requires the investment of a considerably greater level of resources, services and expertise in providing for the handicapped child's needs. Careful attention is also given to the implementation processes associated with the educational plan in an attempt to insure that its goals and objectives are achieved to the maximum extent possible.

The standards and recommended procedures presented above as satisfying the letter of the law IEP requirements are viewed as a *starting point* for an IEP process meeting the letter and spirit of the law. The standards and procedures to be presented and discussed below represent ideal and exemplary practice. It is recognized that many LEAs are not currently in a position to implement all of these recommended procedures. However, the number or proportion of these procedures which can be feasibly implemented is an informal measure of a LEA'S progress in moving from conformance with the letter of the law to achievement of the letter *and* spirit of the law.

The state of Oregon in collaboration with the Regional Resource Center at the University of Oregon has developed an excellent set of best practice procedures for implementing P.L. 94-142. The plan contains a sequence of 44 steps governing activities in the areas of screening, referral, assessment, and IEP development, placement and review. Adapting these procedures and incorporating them into standard LEA practice would be a significant step toward achieving the letter and spirit of the law. There will be substantial overlap between the procedures recommended as best practice by the author and those of the Oregon plan in the areas of *screening, referral* and *assessment.* The Oregon plan does not *directly* address the quality of the IEP document or implementation of the educational program. Standards and procedures presented in these two areas will be based upon information drawn from a variety of sources and the author's experience base with educational interventions and implementation processes. Copies of the Oregon Plan can be obtained from the Regional Resource Center at the University of Oregon. Interested parties should write to: Regional Resource Center, 1590 Willamette Street, Eugene, Oregon 97401 and ask for a copy of *Recommended Procedures for the Administration of Special Education Programs in Oregon.* The cost of both volumes is approximately $12.

Initial Identification.

Systematic screening procedures should be implemented on a regular basis to identify potentially eligible handicapped children. There are a number of acceptable approaches to this task. However, the author recommends the following best practice procedures in the screening process:

(1) That classroom teachers be given inservice training in the areas of (a) behavioral characteristics of handicapped children, (b) exemplary procedures for rating child behavior, (c) the influence of labels, biases and response sets upon ratings and (d) practical observation techniques and procedures for use in the classroom.

(2) That teachers be encouraged to refer children for consideration, whom they are concerned about, at any time.

(3) That systematic screening procedures be implemented on a regular basis to identify potentially eligible handicapped children.

(4) That parents be informed of and included in the screening process at an early point.

(5) That systematic case review procedures be conducted for all handicapped children referred by teachers and identified in the screening process.

Teacher judgement is an extremely important variable in the initial identification of handicapped children. Teachers, more than any other social agent, are in a position to be aware of a child's problems in the areas of school achievement and adjustment. However, we have not always used this valuable source of information well in our attempts to identify child needs.

Recent research by Jones and Cobb (1973), Bolstad (1974) and Greenwood, Walker, Todd and Hops (1976) indicates that teachers can be extremely accurate in their judgements of child behavior. It is important for educators to take advantage of this capability in the screening-identification process.

The screening-identification capability of classroom teachers can be used most effectively if some structure is provided in their judgement of child behavior. That is, teachers should, whenever possible, be provided with rating criteria and procedures for use in evaluating child behavior.

It is also recommended that teachers systematically rate or screen *all* children in their classes on a regular basis using an appropriate screening device. Normative data bases could be established within the LEA over time on the instrument and children receiving extreme scores referred for further assessment and/or information gathering activities. In this manner, potentially handicapped children would be identified in two ways (1) on a systematic basis as a result of regularly scheduled group screening procedures and (2) intermittently as potentially handicapped children come to the attention of the teacher. It is important that a screening instrument be completed on children individually identified by the teacher so the child's profile can be compared with the existing normative data base used for selecting screened children for further consideration.

Ideally all children should be systematically screened at least twice per year. Newcomers to a district during the school year should be screened as a matter of course. Preferrably, screening should occur 1 to 2 months after the start of the school year and again at mid-year. If systematic screening procedures cannot be implemented at least throughout the elementary grades, it is essential that they be available for children in grades K-3. This would allow LEAs to identify handicapped children early in their school careers and determine whether IEPs should be developed for them. This would clearly be in keeping with both the letter and spirit of P.L. 94-142 and the IEP provision.

The Oregon plan contains an easy to use, and behavior specific screening instrument that is appropriate for this purpose. This instrument, an adaptation of it or a similar one should be considered by LEAs for screening purposes. The instrument consists of 32 items and is divided into four general areas: (1) communication problems, (2) physical problems, (3) classroom behavior problems and (4) academic problems. Teachers are asked to make frequency estimates for each item on the instrument, e.g., *sometimes, often, always.* The instrument also provides for narrative descriptions of the child's functioning as well.

The items are negatively stated and thus identify either deficits or problematic areas of functioning. They are also stated in overt, behavioral terms which increases their appropriateness for assessment and program planning purposes and improves interrater reliability.

Items that are stated in non behavioral terms or that ask raters to make inferential judgements are not especially functional for the tasks of screening, identification and program planning. Unless special circumstances or requirements indicate otherwise, screening and assessment instruments consisting of such items should be avoided.

The parents of a child referred individually by a classroom teacher or identified through the screening process should be informed as soon as possible of the school's concern and of the appropriate next steps to be taken and requested to provide as much background information as possible concerning the problem area(s) identified for the child. School personnel should communicate their concerns frankly and completely at this point. A parent conference would be desirable but at the least, telephone contact should be initiated. An interview form or structured interview procedures should be considered in this task in order to standardize implementation and to insure that the necessary questions are asked. This procedure offers the advantages of (a) keeping parents informed, (b) obtaining relevant information that only parents may have and (c) preventing potentially hostile reactions by parents to school procedures involving their child, e.g., assessment, information gathering or programming activities.

Finally, systematic case review procedures should be initiated for each child identified through either individual or group screening procedures. This process should also be standardized in order to insure consistent and effective application of review procedures. The Oregon plan contains a record review form for use in this task and should be considered if case review procedures are implemented.

These three sources of information, i.e., *classroom teacher, parent* and *case review* should be sampled for each potentially handicapped child. Together, they can provide powerful convergent validity in the screening-identification process (Greenwood, Walker, Todd & Hops, 1976). It is recommended that the screening information produced by classroom teachers be used as the primary basis for determining whether the child in question should be examined further in the assessment process. This is because of (a) the teacher's extensive opportunities to observe the child's functioning and/or problems and (b) the opportunity to compare any referred child's profile with an existing data base generated by previous referrals. Information produced by the case review procedure and obtained from parents can be used to corroborate teacher screening data and to pinpoint areas needing further assessment.

Teacher judgement of child behavior has enjoyed a "bad press" over the years dating from the early work of Wickman (1928). In the author's opinion this is due in no small part to researchers asking classroom teachers the wrong questions with respect to child behavior, e.g., asking teachers to rate child behavior along clinical dimensions and using the judgements of clinicians as validation criterion for teacher ratings of child behavior. Jones and Cobb (1973), for example, demonstrated that when given equivalent information, teachers proved to be as accurate as professionally trained observers in their judgements of child behavior. Both Boldstad (1974) and Greenwood, Walker, Todd and Hops (1976) demonstrated that classroom teachers were very accurate in identifying children experiencing behavior disorders.

If teachers are asked to make judgements about the *overt* behavioral functioning of children or about academic performance, the information produced can be accurate, reliable and valuable for decision making purposes. The appropriate use of teacher input can be a very effective first step in the screening-identification process for handicapped children.

Referral.

The material presented earlier on referral procedures would apply equally to an IEP process meeting the letter and spirit of the law. The case manager approach to receiving and expediting referrals from teachers or other school personnel, seems to be a highly viable one. Depending upon the size of the LEA involved, a cadre of these individuals should be maintained to facilitate the referral process. As mentioned they should be knowledgeable concerning eligibility criteria and requirements, placement options and *available* programming alternatives for handicapped children within the LEA. They should also be in a position to offer referring schools technical aassistance and/or related services should the child not qualify for special education or if a referral is considered inappropriate. However, it is important that both decision criteria and decision procedures be clearly specified with respect to the processing of referrals and that case managers follow them consistently.

Once a child is identified as potentially handicapped and a focus of concern, the following best practice procedures are recommended:

Step One. Child's profile on the screening instrument is compared to the normative data base available for previously referred children with similar characteristics and handicapping condition.

Step Two. Specific deficits and problem areas on the screening instrument are identified. Overall statement of concern is developed.

Step Three. Child's parents are contacted. Concerns are shared and related information obtained via structured procedures.

Step Four. Case review procedures are initiated. Findings are collated and summarized.

Step Five. Decision is made as to whether a referral to special education is warranted.

> *If no.* Technical assistance or related services should be offered to the referring teacher or the problem should be referred back to the home school for response within school resources.
> *If yes.* A child study team should be formulated including (a) evaluation experts, (b) the referring teacher, (c) *all* specialists and teachers who may potentially offer services during implementation of an educational program plan, (d) other specialists as required and (e) the child's parents.

Step Six. An organizational meeting of the team should be scheduled to review the case (including material already gathered) to determine whether adequate information exists to determine eligibility and to discuss potential strategies.

Step Seven. Evaluation experts should be assigned to carry out assessment activities for (1) determining eligibility, (2) assessing current level of performance and (3) obtaining diagnostic information in areas of suspected disability. If a comprehensive assessment is required, obtain prior parental permission.

Step Eight. Once the necessary information has been collected, the child's eligibility for special education should be determined.

> *If not eligible,* a meeting should be held to communicate information to parents and other team members and to discuss strategies for responding to referral concerns.
> *If eligible,* a meeting should be scheduled to plan an IEP and discuss strategies for implementation.

Developing an IEP

The manner in which the IEP planning meeting is conducted is an issue that should be of concern to educators. Two of the most significant factors impacting upon the quality of the IEP planning process are (1) the thoroughness and conscientiousness of information gathering activities relating to referral and program planning and (2) the manner in which the IEP planning meeting is organized and conducted.

There are no available guidelines which indicate who should chair the IEP meeting. However, in the author's opinion, the case manager is an ideal candidate for this role.

These individuals are usually knowledgeable about and advocates for handicapped children. They should have a clear understanding of the complexities involved in assessing handicapped children and be aware of available technologies for coping with their needs. By virtue of their training and interests they are likely to be sensitive to interpersonal issues and group dynamics which operate in group problem solving situations. Finally, they are likely to be aware of all available placements and programming options within the LEA — an essential requirement for an effective IEP planning process.

Whenever possible individuals having the above characteristics should function as chairpersons for child study teams. It would also be highly desirable for both potential and actual chairpersons to receive inservice training in group dynamics, group process and the management of interpersonal relationships in problem solving situations.

It is important for the chairperson to provide the kind of focused, child oriented leadership for the child study team that will facilitate an effective planning process. The following best practice procedures to be observed in the IEP meeting are seen as the responsibilities of the chairperson. They are:

(1) the needs and interests of the child rather than administrative or logistical convenience should dominate the planning process.

(2) *under no circumstances* should either the parents or the child be blamed for whatever difficulties the child is experiencing.

(3) the planning process should not be mediated or controlled by *categorical* labels assigned to the child which may limit expectations relating to his/her ability to profit from available services.

(4) parents and teachers should be given status equal to other team members in the decision-making and planning process.

(5) the planning process should in no way be routinized in order to respond to pressures for mass processing.

(6) if it becomes apparent that expertise within the child study team is not sufficient to design a responsive IEP, this expertise should be located and consultative services contracted for.

(7) precise and complete information should be available to the child study team on the salient characteristics of available services and placement within the LEA.

(8) if resources and services are not available for responding to the child's identified needs, efforts should be made to contract for such services or to develop them within the LEA.

The above requirements are time consuming and expensive. Nevertheless, careful adherence to them will be reflected in a thorough and effective planning process which will in the long run, prove to be cost effective.

Nothing less than development of a total service plan will suffice for purposes of satisfying both the letter and spirit of the IEP provision. A total service plan should be developed which either meets all the child's identified needs or as many as possible given available resources and services. The plan should consist of two sections: (1) an individualized educational plan based upon extensive diagnostic information and (2) an individualized implementation (or instructional) plan which specifies the strategies and procedures to be used in achieving goals and objectives contained in the IEP.

The chairperson of the child study team should designate a professional team member as the IEP manager. In the author's opinion, this role or position is critical to a successful implementation of the IEP. The individual selected should be an expert, if possible, in the handicapped child's primary disability area. However, given the teams' makeup, this may not always be possible.

At a minimum, the IEP manager should have the skills and experience necessary to supervise teachers and other professionals in the delivery of essential services to handicapped children. This individual should be able to provide technical assistance in the implementation process and to monitor and evaluate the quality of implementation efforts. Finally, the IEP manager should be capable of effectively coordinating the efforts of a potentially large number of implementation agents.

The two major responsibilities of the IEP manager are: (1) to assist service providers with the tasks of developing short term instructional objectives and strategies that will achieve annual goals and (2) to insure that teaching and management strategies are implemented with the maximum precision and effectiveness possible. It is recommended that a 20 to 30 day period be designated immediately following development of the IEP in which the IEP manager and service providers attend to the above tasks. The manager would be charged with responsibility for insuring that a viable educational plan is implemented, trial tested and revised as necessary within this period. It is highly recommended that a followup meeting be held at the end of this 20 to 30 day period to discuss the plan and respond to whatever problems still exist.

Finally, it is recommended that LEAs consider establishing an IEP advisory committee (Neubauer, Bardsley & Franklin, 1977). The committee should have representation from regular education, special education and support services, e.g., school psychology, social work, speech therapy and so forth as well as from administrators who supervise service delivery. The committee would establish policy relating to IEP implementation practices, monitor and review the functioning of child study teams in the IEP planning and implementation process and evaluate LEA resources necessary for effectively responding to the work pressures produced by the IEP requirements.

Monitoring and Evaluation of the IEP.

A monitoring-evaluation procedure meeting the letter and spirit of the law would contain both *formative* and *summative* evaluation properties. That is, the planning process should specify monitoring procedures that would be of sufficient frequency and sensitivity to allow changes in the plan as needed. The IEP manager would be in a position to establish, monitor and act upon information produced by a monitoring system of this type.

Summative evaluation procedures should be scheduled at least annually and preferably semi-annually to determine what impact the IEP is having upon the handicapped child's achievement and adjustment. These reviews would be occasions for revising or eliminating the IEP in use depending upon the child's progress and response to the program. The overall purpose of these reveiws would be to determine the extent to which annual goals are being or have been achieved and to identify procedural changes that could facilitate their achievement.

Concluding Statement

This chapter has contrasted IEP planning process corresponding respectively to the letter versus the letter *and* spirit of the law. There are a variety of approaches that can be used by LEAs to approximate conformance with both the letter and spirit of the planning component of the IEP provision. The author has outlined a set of best practice procedures which would achieve this goal if implemented effectively. These procedures should be viewed as reflecting standards of practice to be achieved in this process rather than as an absolute method for achieving the letter and spirit of the law.

Best Practice Standards

I. Initial Identification and Screening

A. All Children should be screened on a regular basis to identify eligible handicapped children (referral agents should be given inservice training in the observation, coding and rating of child behavior.

B. All handicapped children currently receiving services should be reviewed on a regular basis to determine whether they are being underserved by special education.

II. Referral: establish a case manager's approach or structure for

A. expediting referrals to special education

B. providing assistance to the referral source when referrals are not indicated.

III. Diagnosis and Assessment: conduct assessment activities to

A. determine child's eligibility

B. provide a basis for developing a *prescriptive* educational plan that will be responsive to a child's needs.

IV. Development of an IEP

A. Develop a total service plan consisting of an IEP based upon thorough diagnostic information and an IIP for each goal contained in the IEP.

B. Involve parents as significant information providers and decision makers in the IEP development process.

C. Involve the child on a private individual basis in the IEP development process unless circumstances indicate otherwise.

V. Evaluation of the IEP: schedule both *formative* and *summative* evaluation function into the IEP evaluation process.

CHAPTER III: THE QUALITY OF THE IEP DOCUMENT

Chapter Overview

Chapter two contrasted IEP planning processes corresponding respectively to the letter versus the letter *and* spirit of the law. Similarly, this chapter contrasts IEP *documents* corresponding to the letter versus the letter and spirit of the IEP provision. The IEP document is discussed in terms of its being administratively and legally correct, a record of resources allocated and services provided, a basis for measuring accountability, and functionally valuable as a guide to instruction.

An IEP Document Meeting the Letter of the Law

One measure of quality is legal or administrative completeness. An IEP document is legally and administratively correct if a conscientious effort has been made to address each of the following IEP elements. These are:

(1) A statement of the child's present levels of educational performance.
(2) A statement of annual goals, including short-term instructional objectives.
(3) A statement of the specific special education and related services to be provided to the child, and the extent to which the child will be able to participate in regular educational programs.
(4) The projected dates for initiation and the anticipated duration of the services.
(5) Appropriate objective criteria and evaluation procedures and schedules for determining on at least an annual basis whether the short-term instructional objectives are being achieved.

Since the IEP provision does not specify qualitative standards to be achieved in the IEP development process nor does it indicate what level of effort should be expended in developing an acceptable document, educators are given considerable discretion in preparing an IEP document.

In the author's opinion, this will result in substantial variability in the quality and completeness of IEP documents produced by LEAs. Some documents will likely satisfy only minimal legal and administrative requirements while others will represent total service plans which can serve as true guides to instruction. The quality of documents produced will be, in part, a function of the LEA's perspective on the IEP requirement. If the IEP is viewed simply as a legal and administrative requirement before services can be made available to a handicapped child, the IEP document and the effort expended in its development will be reflected accordingly. Conversely, if the IEP is viewed as a means of individualizing instruction for handicapped children and tailoring such instruction to their needs, the IEP document will reflect *this* perspective equally well.

One could argue that natural pressures exist in the IEP process which would contribute to the development of high quality IEPs. For example, required parent approval and review of the IEP could pressure educators into developing a quality IEP. Similarly, the standards of professional child study team members and the public nature of the IEP development process would create pressures for producing quality documents and programs.

These arguments have considerable face validity. However, in the author's estimation, the above pressures would not be sufficient to insure the development of high quality IEPs in LEAs that viewed the IEP process primarily as a legal-administrative requirement. Except in rare cases, parents have neither the experience base nor the technical knowledge to judge the quality of an IEP.

The experience of the Chapter 766 law in Massachusetts indicates that powerful pressures exist, in LEAs which can lead to the routinization of individualized planning processes. Limited resources and severe work load pressures, further exacerbated by the amount of staff time involved in the planning process, would likely offset the potentially positive effects of these factors. Staff expertise and the LEA's committment to the IEP process as a vehicle for individualization of services for handicapped children are probably two of the most important variables influencing the quality of developed IEPs. LEAs are likely to differ considerably along these two dimensions.

Thus, the above factors not withstanding, in order to meet the letter of the IEP provision, a completed document must simply address the elements listed above in a way that allows implementation and provides a basis for annual review. It is possible that states and/or the federal government will eventually develop standards relating to the level of completeness and quality of IEP documents. However, they do not currently exist. In the author's opinion IEPs meeting only the letter of the law will often not be sufficient to have a significant impact upon a handicapped child's achievement and adjustment. A much more rigorous and thoroughly developed IEP would be necessary in most instances for the achievement of such an outcome. An IEP meeting both the letter *and* spirit of the law would, in the author's judgement, do so. Characteristics of such an IEP are presented and discussed below.

An IEP Document Meeting the Letter and Spirit of the Law

An IEP document meeting the law's letter and spirit would, as noted earlier, be a total service plan that would be administratively and legally correct *and* serve as a true guide to instruction. The document would: (1) describe a child's specific needs, (2) provide a record of resources allocated and services to be provided, (3) provide a basis for measuring accountability and (4) serve as a true guide to instruction by specifying strategies to be used in achieving instructional objectives and in turn annual goals.

The IEP would be viewed as the primary vehicle for documenting the handicapped child's needs and as a means for developing and implementing an exemplary educational program. The document would also address those additional elements contained in the proposed regulations but eliminated in the final ones. These are (1) specifying the type of physical education program in which the child will participate, (2) specifying any special media or materials required in implementing the program, (3) providing a justification or rationale for the type of educational placement selected and (4) providing a list of individuals who are responsible for implementing the child's IEP. In the author's opinion these additional elements, though possibly burdensome to LEAs, would build in greater accountability and result in the delivery of more comprehensive and possibly higher quality services to handicapped children.

There are seven general issues or factors that must be attended to carefully in the development of an exemplary IEP which meets both the letter and spirit of the law. These are (1) the adequacy, quality and completeness of information used to develop the plan, (2) the internal consistency of the document, (3) the comprehensiveness with which IEP and IIP elements are addressed, (4) the quality and specificity of long-term and short-term objectives, (5) guidelines for evaluation procedures, (6) guidelines for determining an appropriate placement for the handicapped child, (7) guidelines for developing an IEP with implementation instructions specified so that it can function as a true guide to instruction.

The Adequacy, Quality and Completeness of Information Used to Develop the Total Service Plan

It is obvious that any instructional or implementation plan is only as good as the diagnostic and assessment data upon which it is based. It is important that the handicapped child's current level of educational functioning be evaluated to determine eligibility and to document the handicapping condition's impact upon child competence in behavioral, academic and social areas. This type of information *may* be sufficient in some instances for developing the IEP, i.e., section one of a total service plan. However, it would be totally inadequate for developing an individualized implementation or instructional plan, i.e., section two of a total service plan.

Specific deficits need to be identified in order to develop an IIP. Norm referenced tests, which document a child's status in relation to age-grade performance levels, do not provide information on such deficits (Bateman, 1977, Liberty, 1971). Diagnostic tests and criterion references measures do produce such information. Further, criterion referenced tests and some diagnostic tests *yield direct teaching implications via the assessment process.*

It is critical that accurate and comprehensive information of this type be available to a child study team in the development of a total service plan. Traditional approaches to assessment in special education and supportive services systems such as school psychology tend to describe a child's status in relation to age-grade expectations. The focus is generally not upon assessment as a basis for program planning and development.

It is entirely possible that child study teams will have to require two types of assessment which may have to be scheduled at different points in time. These are assessment for the purposes of determining eligibility and documenting the severity of the handicapping condition and a second assessment for the purpose of program planning and implementation. The first assessment should occur shortly after a decision has been made to refer a child to special education and the second prior to development of a total service plan. Depending upon the outcome of the first assessment, the second may not be necessary. The first assessment would use primarily norm referenced tests, e.g., standardized achievement tests, measures of language and adaptive behavior, checklists and rating scales and so forth. The second assessment would use individualized diagnostic and criterion referenced testing procedures.

Whenever possible the use of multiple instruments measuring approximately the same domain is recommended. This rule applies to both assessment procedures. Program planners should be especially sensitive to the convergence of different instruments and testing procedures in identifying-documenting performance deficits. Data and information obtained from parent input-interviews and case review procedures can also be used to establish convergence. Differing vantage points provided by these varied information sources can be extremely valuable in program planning activities.

The Internal Consistency of the IEP Document

The internal consistency of the IEP document is an important issue in terms of its implications for program implementation. Internal consistency refers to the logical relationship that exists between annual goals, short term instructional objectives and the strategies selected to achieve them. Logic suggests that strategies should be selected which bear a *direct* relationship to achievement of short-term instructional objectives. If, in turn, short-term instructional objectives are achieved, then annual goals relating to each set of instructional objectives should be automatically realized. However, if achievement of all short term objectives relating to a specific annual goal does not result in achievement of the annual goal, then the planning process is obviously in error and needs to be revised in relation to that goal. This is likely to be a fairly common outcome in the planning and implementation of IEP's given the fallability of human judgement.

Annual goals should bear the same relationship to short-term instructional objectives in the IEP as the terminal objective in task analysis bears to sub tasks or intermediate objectives used to achieve the terminal objective. That is, an annual goal represents an overall summative statement of performance to be exhibited by the handicapped child after a year of instruction. Using the best professional judgement and information available, annual performance goals should be established in each problem area and/or of deficiency in the child's functioning. Then instructional objectives should be developed which, if achieved, will result in attainment of the annual goal. Finally, appropriate strategies are selected for achieving short-term objectives. Thus, an interrelated three stage process is involved in the attainment of annual goals.

There are no firm guidelines available for the selection of annual goals, short-term objectives and strategies. However, experience and logic clearly suggest some issues to consider in this process. For example, the appropriate selection of annual goals for a given handicapped child would involve consideration of such factors as (1) the nature and severity of the handicapping condition and a clear assessment of its impact upon the child's achievement and adjustment, (2) an intimate knowledge of available technologies for teaching required skills and behaviors and their applicability to handicapped populations, (3) the child's previous rate of achievement and (4) available resources and services for implementation of the plan.

There are two general approaches to selecting short-term objectives for the achievement of annual goals depending upon the nature of the deficit responding or problem involved. In dealing with relatively discrete problems or deficits that can be corrected within the span of a single academic year, it is appropriate to state the annual goal in terms of this expectation. Examples would be (1) eliminating an articulation disorder (depending on its severity), (2) learning to dress oneself or (3) suppressing tantrum like behavior in the classroom. Except in rare cases, each of these conditions would be correctable within the span of an academic year.

Each of these tasks could be stated as an annual goal in an IEP. The primary goal would be to achieve each task as rapidly as possible and then to maintain the task mastery or changed behavior over the remainder of the school year. As in task analysis, the first step would be to identify the specific sub tasks that must be mastered in order to achieve the overall task or terminal goal. Bateman

(1971) notes that analyzing a task into its required subtasks is first logical and then empirical. That is, the teacher or service provider must initially rely upon such techniques as logical analysis or reason, available experts, curriculum guides, past experience with teaching similar skills, knowledge of how children respond and perform in classrooms and so forth. The next step is to try out the system with children and revise it as necessary.

In analyzing relatively discrete problems and/or performance deficits that are correctable within a short period of time, it is not always necessary to arrange sub-tasks or intermediate objectives in sequential order. One should identify those sub-tasks or skills that are crucial to performance of the terminal objective and arrange for their mastery in whatever order is logically or programmatically appropriate. For example, if a child displays a consistent pattern of aggressive behavior on the playground, one could identify a logical series of sub-tasks that should be carried out in a behavior change program. In the example given here, the following steps should be completed as part of the child's behavior change program:

Step (A) – Determine whether the child views or perceives his/her behavior as inappropriate –

Step (B) – Determine if the child has a clear understanding of the rules governing appropriate behavior on the playground –

Step (C) – Determine whether there are specific playground stimulus conditions (such as certain games or groupings of children) that prompt the aggressive behavior –

Step (D) – Determine whether the child has a repertoire of appropriate social skills for interacting with other children –

Any or all of the factors listed above could contribute to the behavior problems the child is experiencing. It would be important to systematically examine each before designing an overall intervention procedure for changing the behavior pattern. However, in this case, the order in which these sub-tasks are carried out doesn't really matter. The important thing is to list them as specific goal objectives and to attend very carefully to each in the implementation process. Components of the final intervention procedures should address each factor given above that is found to have a causative or potentially causative relationship to the child's behavior problems.

For example, say that variables (B) and (D) above appear to be related to the child's behavior problems and variables (A) and (C) are not relevant. Thus, the final intervention program should contain instructional procedures which: (1) insure that the child has a clear and complete understanding of *all* playground rules and (2) insure that the child can demonstrate both conceptual and behavioral mastery of appropriate social skills, e.g., initiating, responding to and continuing *positive* social interactions over time.

Next, a series of sub-tasks should be identified which are crucial to insuring that the child's interactive behavior actually changes. These would involve the programming of procedures for (a) motivating the child to display a pattern of positive approach behavior toward peers, (b) motivating peers to respond positively to the child's behavior, (c) maintaining the changed behavior of both the child and peers over the long-term and (d) gradually withdrawing the external intervention procedures.

The above tasks (a) through (d) are all part of the overall intervention procedure designed to achieve the terminal goal of changing the child's pattern of aggressive behavior. Their sequential order is naturally arranged from (a) through (d) by requirements of the programming process. Thus in this general approach, the task is to select achievable annual goals with respect to discrete performance deficits or problems and to identify the specific sub-tasks or objectives that must be carried out in order to achieve the overall goal.

A second approach to setting annual goals and identifying short-term instructional objectives is more additive or summative. That is, annual goals are stated in terms of the ordered, short-term objectives that the child can be expected to complete within one instructional year. This approach can be appropriate in instructional areas such as reading, mathematics and language where curriculum guides order objectives in appropriate sequences. Many published curricula have built in sequences of objectives that extend across units. If a handicapped child is deficient in one or more of these instructional areas he/she can enter the sequence of instructional objectives at an appropriate level as determined by criterion referenced testing procedures. An annual goal would be the child study team's best estimate as to how far the child could progress through these objectives in a year's time given available instruction, expertise and services. System FORE (Reeder, 1978) is an example of an instructional system using such an ordered approach to instructional objectives in varied curriculum areas.

A review of state plans indicates that such lists of objectives are very popular in the IEP process. In many instances their use can be quite appropriate and can save child study teams a great deal of planning time. However, it is important to insure that these lists are appropriate for handicapped children. In some cases, the sequencing and steps between objectives may have to be changed in order to make them appropriate for handicapped children.

In establishing annual goals, it is important to determine whether each goal (1) represents a discrete problem or deficit that can be remediated within an instructional year or (2) represents a generalized deficit of a more complex and severe nature which requires more than a single year for remediation or correction. For handicapped children, discrete deficits/problems are likely to be of a behavioral nature while generalized deficts/problems will likely be of an academic nature. The type of deficit or problem involved will determine the approach to be used in developing instructional objectives. It is extremely important that the approach selected be individualized, comprehensive and thorough.

The final evaluation criterion for the development of short term objectives is whether they result in the successful achievement of appropriately established annual goals.

Strategies selected for achieving short term objectives should bear the same direct relationship to them that annual goals bear to such objectives. Strategies should be selected which have a high probability of resulting in the achievement of the instructional objectives. For example, if a highly aggressive child is choking peers in the classroom, in the hallways and on the playgound, it would make little sense to select a play therapy or role playing approach to the problem as an initial strategy. Choking is a very serious and potenitally dangerous behavior. A strategy would be needed for the behavior that is extremely powerful and that would surpress choking very quickly. Most educators would agree that play therapy or role playing would be an inappropriate response to this situation.

It is essential that child study teams either include or have access to experts in the disability areas being programmed for in development of the IEP. These individuals would be knowledgeable regarding the selection of appropriate strategies for achieving instructional objectives. They would also be able to facilitate development of IIPs in their respective areas of expertise.

Adherence to the guidelines and suggestions presented above should build in functional interrelationships between annual goals, short term instructional objectives and strategies for achieving them. Such interrelationships are crucial to the development of a viable educational program.

The Comprehensiveness with which IEP and IIP Elements are Addressed

As already noted, an IEP document meeting the letter and spirit of the law would be a total service plan consisting of an IEP and an IIP. Annual goals should be identified, prioritized and listed on the IEP. An IIP should then be developed for each annual goal listed on the IEP. The reader is referred to Schrag (1977) for examples of appropriate IEP and IIP forms. The IIP should list instructional objectives for each annual goal, strategies for achieving objectives, materials and resources to be used and criteria for determining mastery of each instructional objective.

The IEP manager should work carefully with each service provider in developing IIPs for the annual goal(s) for which they are responsible. Experts should be consulted as necessary in this process to insure that the most appropriate technology is made available to the service provider. The IEP manager and the service provider should also develop a plan for implementing the strategies selected for achieving instructional objectives. This plan should be written and carefully explicated whenever possible.

The IEP should identify global areas of need for the handicapped child, services to be provided, individuals responsible for each annual goal, a placement rationale, extent of involvement in the regular educational program and so forth. The IEP should be legally and administratively complete but its focus clearly child oriented. The IIP should be very detailed and comprehensive. This document should specify the procedural aspects of implementation in a manner that serves as a true guide to instruction.

The Quality and Specificity of Long-Term and Short-Term Objectives

There seems to be universal agreement that long-term and short-term objectives should be written in behavioral terms. Behavioral objectives make it possible to build educational accountability features into the teaching-learning process and are very useful in programming instruction. Thompson (1977) has presented a set of criteria for writing high quality long-term and short-term objectives in the IEP process.

Long-Term Objectives

Long-term objectives consist of five components. These are (1) the direction of change desired, (2) deficit or excess, (3) present level, (4) expected level and (5) resources needed. There are three possibilities for change, i.e., an increase, a decrease, and no change or maintenance of the present level of functioning. Some child behaviors need to be increased, others decreased and still others maintained. The behavior in question should be identified in the long-term objective as a deficit or excess. The present level refers to the child's current level of functioning with respect to the deficit or excess. The expected level refers to the goal that is realistic for the child to achieve, given available resources. The resources needed refer to those required for the expected level to be achieved. An example of the use of these five elements in writing a long-term objective is presented below:

(direction) (deficit) (from) (to)
Increase / reading readiness / from pre-primer / to primer level /
(resources needed)
individual and small group instruction and parent tutoring

The development of annual goals using these five elements would build in considerable standardization and specificity. If these five elements were conscientiously addressed, the quality of annual goals would likely be of consistently high quality in the IEP.

Short-Term Objectives
Short-term objectives have three components. These are (1) performance, (2) conditions and (3) standard or level of performance. Performance refers to what the child is to do with respect to the objectives. The performance expected should be specific and identify a task that can be achieved in a relatively short time, e.g., says numbers to 20, identifies vowel sounds and so forth. The conditions of the performance specify any qualifying or limiting factors upon the performance such as using a hearing aid, given 50 addition facts, without the aid of tutors and so forth. The standard of performance specifies how well the child is to perform, e.g., at least 90 per cent correct, at a rate of no more than one error per minute, with no pauses or redundancies, etc. An example of a short-term objective is presented below:

(conditions) (standard) (performance) (standard)
When provided with examples, correctly identifies and appropriately
(performance)
uses relational concepts.

Short-term objectives in academic areas should, as a general rule contain these three elements. However, objectives in non academic areas, especially those involving behavioral intervention procedures, do not always require the specification of these three elements. For example, instructional objectives relating to the implementation process often do not involve child performance directly but relate to the application of specific intervention techniques or procedures, e.g. "response cost (subtraction of points) will be applied to each instance of aggressive child behavior".

The writer recommends that the criteria established by Thompson be used in developing an IEP whenever feasible and appropriate. Adherence to these criteria would help to standardize the quality of long and short-term objectives across child study teams. Thompson outlines teaching procedures and instructional examples for correctly writing both types of objectives.

Guidelines for Evaluation Procedures
It is important for LEAs to consider development of strategies for evaluating the IEP process and its impact upon educational practice. Stufflebeam, Foley,

Gephart, Guba, Hammond, Merriman and Provus (1971) have identified four types of evaluation that may be appropriate for this process. These are (1) context evaluation, (2) input evaluation, (3) process evaluation and (4) product or outcome evaluation. *Context evaluation* is designed to provide a rationale for determining appropriate objectives for the handicapped child. This type of evaluation involves the collection, assimilation and analysis of considerable information in the process of formulating objectives. *Input evaluation* refers to the process of determining how resources can be most efficiently deployed to achieve the goals of the educational program. *Process evaluation* refers to evaluation for the purpose of identifying the most beneficial and efficient means by which program goals can be achieved. Three major obejctives of process evaluation are (1) to identify defects in implementation, (2) to provide needed information to decision makers and (3) to provide an ongoing record of the procedure as it occurs. *Product* or *outcome evaluation* is concerned with the impact of the program both during (formative evaluation) and after (summative evaluation) the program.

This model seems very appropriate for LEAs to use in evaluating the IEP process. *Context* and *input* evaluation relate primarily to the IEP planning and development process – while *process* and *product* or *outcome* evaluation are concerned with the implementation process and its effectiveness in achieving objectives and annual goals. The author highly recommends that, where possible, LEAs develop expertise and procedures to systematically address each of these evaluation activities in relation to the IEP process. This would seem to be an appropriate task for a LEA advisory committee on IEPs. That is, this committee could assume responsibility and leadership for developing the LEA's capability in these areas. Benefits accruing from systematic evaluation activities of this type could be highly significant over the long term. This approach to evaluation of the IEP process would clearly be consistent with the letter and spirit of the IEP provision.

Guidelines for Determining an Appropriate Placement for the Handicapped Child. The goal of the IEP placement element or component is to insure that the issue of placement for the handicapped child is carefully considered in the planning process. The proposed regulations required a rationale or justification for the placement chosen – the final regulations do not. This is an unfortunate development.

Requiring that a defensible rationale be developed for placement seems consistent with sound educational practice. This requirement insures that the placement issue is systematically and carefully considered and provides the basis for informal accountability. Any IEP process meeting both the letter and spirit of the law would include a defensible rationale for placement.

Congress and the courts have clearly mandated that handicapped children be educated in the least restrictive setting possible and as close to normal peers as possible. However, the primary objective of the IEP provision is the development and implementation of an exemplary educational program for handicapped children. Thus, program planning, implementation and placement are interrelated processes.

In the author's opinion, an IEP should be developed in a way that is largely unconstrained by placement considerations. That is, as a first step, the child study team should identify the child's needs and develop the best educational program possible to respond to those needs given available resources. Next, the team should determine a placement setting as close to the regular classroom as possible where *the program can be implemented effectively and the child's needs met.*

If there is a conflict between effective program implementation and a less restrictive setting, the author recommends that effective program implementation be the deciding factor unless special circumstances exist. For example, if a program is developed for a handicapped child and the chances for effective implementation are significantly greater in a special or resource room setting than in a regular classroom, then the more restrictive setting should be chosen as a matter of standard practice. It would still be possible to expose the handicapped child to contact with normal peers in recess, lunch and physical education periods.

This is often the case when a program is developed requiring the application of complex and technical procedures. If these services are not available in regular classrooms via support personnel or are very difficult to deliver effectively in this setting, then a more restrictive setting should be selected where logistical problems are less severe and the services are available.

This decision rule, e.g., program implementation effectiveness overriding least restrictive setting considerations, assumes that implementation of an exemplary educational program is a primary goal of the IEP provision and placement in less restrictive environments is a secondary one. This interpretation is subject to debate. However, given the current capabilities of LEAs to implement complex intervention procedures in the regular classroom setting, it seems to be a reasonable approach for at least the immediate future.

In addition to program effectiveness and setting restrictiveness considerations, an important factor to consider in placement decisions is the child's chances of achieving success in the primary placement setting (Walker & Hops, 1977). That is, can the child exhibit the level of functioning and/or competence levels required in that setting? These are in a sense entry level behaviors analogous to those assessed in task analysis. Most educational settings have such entry requirements, although they are usually not formally stated. As a rule, the further one is removed from the regular classroom, the less restrictive or exclusive these requirements become.

If a handicapped child is placed in a setting where instructional agents or service providers in that setting believe the child does not have the required entry behaviors or cannot succeed in the setting, the consequences for the child can be disastrous. Thus, not only must the capabilities of various placement settings be taken into account in terms of their ability to provide the necessary child services, but the attitudes of agents within them toward the child must be considered as well. Ignoring this issue could lead to very unpleasant effects for everyone concerned with the IEP process.

It is recommended that all placement options available to the LEA be systematically assessed in terms of (1) their entry behavior requirements, (2) the type and severity of handicapping conditions they can accommodate effectively and (3) their capacity to implement complex intervention or instructional procedures for handicapped children. This information would be invaluable to child study teams in making placement decisions and in developing a justification for them.

Guidelines for Developing an IEP with Implementation Instructions Specified so that it can Function as a True Guide to Instruction.

This task is seen as the overall responsibility of the child study team and its chairperson and should be a goal of an IEP process meeting the letter and spirit of the law. The IEP manager is the individual ultimately responsible for the development of IIPs and for the implementation process.

As noted earlier, the IEP manager should work closely with each service provider in completing IIPs for annual goals in their respective areas. It is extremely important that all service providers be members of the child study team and participate in the IEP planning process. IIPs should then be developed on an individual basis with the IEP manager supervising and providing technical assistance as needed in the specification of short-term objectives and selection of strategies to achieve them.

The IEP manager would be in a position to coordinate the child's total program across service providers and to make maximum cost effective use of available resources and expertise of the service providers. An integral part of the IIP development process is the development of guidelines for the implementation-instruction process — that is, specific rules and procedures to be followed in implementation of the strategies selected for achieving short-term objectives.

Bateman (1977) notes that many educators do not have the technical skills necessary in the areas of task analysis and prescriptive teaching-programming to develop an IIP and implement it effectively. This is equally true with respect to analysis and programming in non-academic areas of functioning. The more skilled a teacher or service provider in these areas, the less specific the implementation guidelines need to be. However, some set of agreed upon guidelines should be developed in advance of implementation in every case to provide a basis for evaluating the implementation effort and insuring that the child's program is applied as intended.

Concluding Statement

This chapter has focused upon the quality of the IEP document. The basic premise of the chapter is that an IEP document meeting only the letter of the law will usually not be sufficient to the task of developing an exemplary educational program. A total service plan is required to achieve this goal.

As previously observed, many LEAs will not be able to incorporate all of the procedures and recommended practices outlined here. However, the posture of LEAs toward the task of developing an effective IEP document should be to produce the best educational program possible given available resources and to build in guidelines, steps, procedures, etc., that will insure its effective implementation.

Best Practice Standards

I. Insure that diagnostic information used to develop the IEP yields direct implications for teaching and programming efforts.

II. Insure that there is a logical, consistent relationship between annual goals, short term instructional objectives and the strategies used to achieve them.

III. Develop a separate and comprehensive IIP for each annual goal listed on the IEP.

IV. Insure that both long and short-term objectives are written in behavioral terms.

V. Consider multiple types and sources of evaluation in assessing the impact of IEPs, e.g., context, input, process and product evaluation.

VI. Develop a defensible rationale for the placement decision reached in relation to each handicapped child to whom services are given.

VII. Insure that the total service plan is written in a way that serves as a true guide to instruction.

CHAPTER IV: IMPLEMENTATION PROCESSES, PRACTICES AND PROCEDURES

Chapter Overview

This chapter describes issues and problems in the area of implementation of IEPs. Numerous logistical, management and philosophical problems will be encountered in the implementation process, especially for handicapped children enrolled in regular classroom settings. Significant problem areas are identified and recommended solutions are presented for responding to them. In addition, best practice procedures are presented for the reader's consideration in areas critical to the successful implementation of the IEP. Hopefully, the material in this chapter will be of technical assistance to LEAs in the effective implementation of IEP's.

As previously noted it is the author's position that insufficient attention has been given to procedures governing implementation of IEP's developed by child study teams. The purpose of this chapter is to delineate potential problem areas in the areas of implementation, monitoring and supervision of IEP's and to suggest procedures which will obviate some of the problems that will be encountered in the implementation process. The following issues will be discussed: (1) the IEP manager's role in the implementation process; (2) improving the academic achievement and social adjustment of handicapped children; (3) the use of direct versus indirect instructional procedures; (4) the use of behavior management and motivational procedures; (5) problems in the generalization and maintenance of behavioral and academic gains; (6) establishing and maintaining quality control of implementation efforts; (7) coordinating systematic implementation efforts across personnel and settings; and (8) dealing with attitudinal and philosophical objections to implementation procedures and requirements.

The IEP Manager's Role in the Implementation Process.

Some attention has already been given to the IEP manager's role and its importance to a successful implementation of a handicapped child's program. It is strongly recommended that an IEP manager be designated by the chairperson of the child study team. The person selected as the IEP manager should (1) be skilled in supervising the individuals implementing the child's IEP, (2) be technically knowledgeable and skilled in instructional and management procedures for handicapped children, (3) be aware of all available placement options, services and special education resources available in the LEA, (4) be skilled in the delivery of consultative services to both regular and special education teachers, and (5) be capable of judging and facilitating the quality of implementation efforts for handicapped children. It would be ideal, of course, if each IEP manager possessed all those qualities. However, realistically there will be many instances in which IEP managers will fall short of this standard. Thus, these qualities should serve only as ideal guidelines for the selection of such individuals.

The IEP manager's responsibilities would normally include the following: (1) assisting service providers with the task of developing IIPs for annual goals in their service area; (2) assuming overall responsibility for coordination, supervision and management of the IEP implementation process; (3) providing technical assistance and consultation to service providers as necessary; (4) serving as an advocate for the handicapped child and informally for the child's parents; and (5) providing liaison between service providers and the child study team. Assuming that an IEP manager performed all these tasks conscientiously, it is not clear at present just how many handicapped children could be carried effectively by one individual.

IEP managers should be selected early in the IEP planning process. In this way they will be able to take full advantage of available expertise on the child study team in planning implementation procedures. This process will also greatly facilitate the tasks of developing and coordinating the implementation of IIPs across different service providers.

The IEP manager's role will consume considerable staff time which many LEAs may not be able to absorb given the existing work pressures generated by P.L. 94-142. It is possible that the IEP manager's role will be eventually mandated as required by Congress as continuing experience with the implementation process demonstrates the critical importance of this role. As P.L. 94-142 becomes fully operational, funds may be available to at least partially offset the cost of the IEP manager position. If an LEA cannot afford the staff time loss incurred by the work requirement of this position, it is recommended that a child study team member be designated to *informally* coordinate the implementation process. Rather than supervising the implementation process and assuming responsibility for it, this individual would simply have coordinative responsibilities.

It is recommended that the IEP manager report to the child study team and its chairperson at regular intervals regarding the quality of implementation and its effectiveness. Brief, informal reviews of this nature should be scheduled as is appropriate and feasible given existing time and work pressures. It may be difficult to schedule such meetings for the entire team. In this case, the IEP manager should report directly to the IEP chairperson who would in turn communicate informally with appropriate team members regarding the child's program. In cases where unresolvable problems develop, the IEP chairperson should call a meeting either of the individuals involved or the entire team to address the problem(s) directly. The IEP manager's monitoring skills, program evaluation capabilities and conscientiousness are critically important in this regard.

Improving the Academic Achievement and Social Adjustment of Handicapped Children

Deficits in the areas of academic achievement and social adjustment are often, closely interrelated in populations of handicapped children. As used here *academic achievement* refers to performance in content curriculum areas normally taught in schools, e.g., reading, math, language, social studies and so forth. *Social adjustment* refers to the child's relationship with teachers and peers as well as the extent to which he/she follows established school rules in classroom and playground settings. Deficits in one area of functioning are often exacerbated by deficits in the other. This is particularly true for emotionally disturbed and behavior disordered children.

The "acting out" child is a case in point. "Acting out" children with all their accompanying academic disabilities, often miss out on avenues of positive reinforcement which are common to the educational setting. Reinforcements for appropriate academic behavior are rarely available for such children. The low probability of success or praise being associated with academic behavior decreases the frequency of appropriate academic behavior in a spiraling process, i.e., the fewer the reinforcements, the less academic work attempted; the less work attempted, the fewer the reinforcements. In addition, many of the social behaviors demonstrated by these children are aversive and thereby preclude or severely limit the probability of their being positively reinforced by teachers or peers, Mattos, Mattson, Walker and Buckley (1969). With such children, it is difficult to know whether the academic deficits are caused by the child's behavior problems or the behavior problems are a function of the academic deficits. The available research data are not clear on this question.

There has been considerable debate on the issue of developing comprehensive educational programs for handicapped children experiencing deficits in both achievement and social adjustment areas. One position asserts that the child's adjustment and behavior problems must be remediated before instruction can be effective. An opposing view argues that if instruction and academic programming are effective, adjustment problems will take care of themselves. A number of researchers have examined the questions of (a) increasing academic performance and measuring its impact upon social behavioral adjustment, (b) increasing appropriate classroom and academically related social behavior and measuring its impact upon academic performance and (c) increasing both simultaneously. The research results on these questions are somewhat equivocal. However, there seems to be evidence that child adjustment and achievement can be increased by each of the above methods (Walker & Hops, 1976).

It is recommended that when handicapped children are experiencing deficits (or problems) in both achievement and adjustment areas, that instructional/intervention procedures focus equally upon these areas. Given the magnitude of the deficits problems experienced by handicapped children one should not depend upon intervention procedures applied in one area of functioning to impact significantly upon other areas. The so-called spread of effect phenomenon has been conspicuously absent in the bulk of literature available on educational interventions. The general rule is: *what you teach is what you get!* Thus, instructional/intervention procedures should be systematically and directly applied to all those areas of child functioning in which growth, change or improvement is expected. A properly constituted IEP representing a total service plan should incorporate this principle as a matter of standard practice.

The Use of Direct Versus Indirect Instructional Procedures

In summarizing the research literature of aptitude-treatment interaction, i.e., the relationship between learner characteristics and instruction, Bateman (1977) suggests there is some evidence for the following hypothesis . . . "namely, that the farther the learner is from mastery as to the objective being taught, the more efficacious are deductive, highly structured, rule-oriented methods and, conversely, the nearer the learner is to independent performance, the more appropriate it becomes to use discovery, inductive or self-selected methods". Assuming that handicapped children are often well below their age-grade peers in academic functioning, this hypothesis suggests that concrete, deductively based and direct methods of instruction would be most appropriate for use in teaching. Distar instruction is an example of this type of instruction. Its demonstrated effectiveness with populations of handicapped children provides support for the above hypothesis.

Systems such as Distar appear to be highly appropriate for accelerating the acquisition rate of handicapped children in basic skills areas such as reading, mathematics and language. The structured approach to teaching contained in these systems facilitates consistent application of instructional procedures across teachers and groups of children. Whenever, possible it is recommended that these systems be used with handicapped children especially in the basic skills areas.

It is also recommended that structured, direct intervention procedures be used to improve the behavioral and social adjustment of handicapped children. When dealing with the task of changing *overt* behavior, the author recommends that direct intervention procedures be selected as a matter of standard practice. This is especially true with populations of handicapped children who are not always as responsive to instructional-intervention procedures as are non-handicapped children.

Direct intervention procedures, as used here, refer to a set of techniques which (a) are externally controlled and/or delivered, (b) are applied directly to the child's overt behavior, (c) are highly structured and (d) establish contingencies between the child's behavior and consequences which follow it. Patterson, Cobb and Ray (1972) present an excellent example of direct intervention procedures used in the classroom setting for changing the behavior of the aggressive child.

The impact and efficacy of direct intervention procedures of this type in changing child behavior have been thoroughly documented (Becker, 1976; O'Leary & O'Leary, 1977; Walker & Buckley, 1974; Walker, in press). They are the most powerful procedures available for remediating the behavior problems and deficits of children in general and particularly for handicapped children. They represent a highly developed technology for use by educators in improving the social adjustment of handicapped children.

It is important to note that *indirect* intervention procedures do have an appropriate role to play in this area. Indirect procedures refer to techniques such as counselling, roleplaying and psychotherapy. These procedures do not manipulate behavior directly but instead focus upon developing a cognitive awareness of the causes of behavior problem(s) on the assumption that such an awareness will lead to therapeutically significant and durable changes in behavior. The validity of this assumption has been the subject of considerable debate in the literature (Ulman & Krasner, 1965). The degree to which changes in overt child behavior can be produced via such procedures is not clear at present.

In the author's opinion, direct intervention procedures should be used to produce changes in overt child behavior with indirect procedures such as counselling, verbal instructions and/or role playing used to supplement this process. These techniques can facilitate the effectiveness of direct intervention procedures and should be used in conjunction with them whenever possible. As a rule children should be given a rationale for and a cognitive understanding of the procedural details and operation of whatever direct intervention procedures are applied. The author has found this to be a very effective technique for producing rapid and significant intervention effects. This procedure may be especially appropriate for handicapped children whose responsiveness to instructional/intervention procedures is often limited or attenuated by the nature of the handicapping condition.

Finally there is almost universal agreement that annual goals and objectives for achieving them should be stated in behavioral and measurable terms. Further, *objective* criteria are to be used in determining whether short-term instructional goals are achieved. Thus, it appears that such requirements and accepted practice actually mandate the use of direct instructional and intervention procedures with handicapped children. In the author's opinion, it would be difficult at best to achieve behavioral objectives with handicapped children using only indirect instructional and/or intervention procedures.

The Use of Behavior Management and Motivational Procedures

The use of effective behavior management techniques and systematic motivational procedures, where appropriate, are generally considered to be components of good teaching. However, both regular and special educators vary extensively with respect to skill level in these two areas. The effective teaching and management of handicapped children often requires the systematic application of such procedures. In order to learn effectively, handicapped children often require special materials, special management procedures and special instructional techniques.

It is the IEP manager's task to insure that this technology is made available to handicapped children enrolled in either regular or special settings. Thus a major portion of the IEP manager's implementation activities will focus on the training of teachers in the correct and effective application of instructional/intervention techniques. Whenever possible, it would be desirable for teachers to be trained via systematic inservice workshops. However, the bulk of such training will likely occur in the process of implementing IEPs for specific children.

For training of this nature to be effective, the IEP manager should be skilled in consulting with teachers regarding management/instructional problems in the classroom. The manager should be able to demonstrate the application of effective intervention techniques, to teach the teacher to use these techniques correctly and to provide teachers with specific feedback on their performance. These processes are absolutely essential to the task of building in mastery in the classroom setting.

It has been the author's impression that the academic-vocational needs of handicapped children have been attended to much more carefully than have their behavioral, social, emotional and psychological needs. It appears that the social-behavioral functioning of handicapped children has had at least as great an influence in the exclusion of handicapped children from mainstream educational settings as have deficits in their academic functioning. Many regular educators have expressed grave concerns about their ability to cope with the behavior problems and requirements of handicapped children. They have expressed significantly less concern about their ability to provide for the academic needs of such children. It is entirely possible that the *social-behavioral adjustment* of handicapped children to mainstream settings will have a much greater influence than their academic adjustment in determining the ultimate success of the mainstreaming movement.

Child study teams and IEP managers are in a position to significantly influence the development of handicapped children in the social-behavioral area and to provide teachers with the assistance they require in coping with children's needs in this area. In the author's opinion this kind of assistance is absolutely critical. Further, such assistance should be directed both at the handicapped child and at the child's teachers. Handicapped children need to acquire the "survival skills", e.g., attending to task, listening to instructions, following directions, complying with teacher requests and so forth required for a satisfactory academic adjustment to the classroom. Further, they need to also acquire the social skills necessary for developing positive relationships with peers. Both of these sets of skills are essential to maintaining handicapped children in less restrictive settings where demands on the child are greater and skill levels necessary for successful performance are higher.

Equally important, technical assistance must be given in an appropriate and meaningful manner to the primary service delivery agent for handicapped children, e.g., the classroom teacher. This is no easy task and will greatly tax the skills and expertise of teacher support personnel providing such assistance. Support personnel will find systematic behavior management techniques and motivational procedures to be essential tools for achieving these goals.

Problems in the Generalizationing and Maintenance of Behavioral and Academic Gains

Early research on classroom intervention effects tended to assume that behavioral and academic gains produced in one setting would become an integral part of the child's performance repertoire and be displayed across settings and also prove to be durable over the long term. Research conducted within the last 5-10 years is seriously calling into question the validity of these two assumptions. Research data are increasingly showing that intervention effects are specific to the settings in which they are produced and do not necessarily maintain over time (O'Leary & Drabman, 1971; Walker, Mattson & Buckley, 1971; Walker & Buckley, 1972; Kazdin & Botzin, 1972; Stokes & Baer, 1977; Walker, Hops & Johnson, 1975; and Greenwood, Hops & Walker, 1977).

The available research evidence on these questions indicate that the effective generalization and maintenance of modified behavior does not naturally occur when treatment procedures are abruptly withdrawn (Birnbrauer, Wolf, Kidder, & Tague, 1965; Kuypers, Becker, & O'Leary, 1968; Walker, Mattson, & Buckley, 1971). Unless systematic fading procedures are used (O'Leary, Becker, Evans, & Saudargas, 1969) or attempts are made to transfer behavioral control to readily available reinforcers, or efforts are made to reprogram the environment in which maintenance and/or generalization is expected (Greenwood, Hops, & Walker, 1977; Walker & Buckley, 1968, 1972; Walker, Hops, & Johnson, 1975) it is unlikely that the changed behavior will maintain or generalize automatically (Johnson, Bolstad, & Lobitz, 1976; Walker & Buckely, 1974).

A popular treatment alternative within special education has been the referral and assignment of handicapped children to a special or resource classroom for a period of time. Regular classroom teachers expect the referred child to acquire a new, more appropriate behavior pattern and improved academic skills while assigned to the special setting. At some point, a collective judgement is made, based usually upon the child's performance in the special setting, that he/she should be reintegrated. Typically this is done with no systematic reintegration / followup services to facilitate the transition and to reprogram the receiving environment so as to support and actively reinforce the child's changed behavior.

As Tramontana (1971) notes, one must wonder about the effect the unmodified natural environment would eventually have on the behavior change(s) produced in this situation. Logically, one would expect that the deviant/inappropriate behavior would again be strengthened and that the behavior developed in the special setting would be weakened and eventually extinguished. Indeed, the available evidence on this question seems to support Tramontana's (1971) view (Walker & Buckley, 1972; Walker, Mattson, & Buckley, 1971).

When the child is reintegrated from a special setting, regular classroom teachers usually expect her/him to be "cured" and that the referral problem(s) have been ameliorated. Almost invariably, regular teachers are disappointed in this respect. Given the specificity of human behavior (Mischel, 1968) and the fact that the contingencies in the referring regular classroom have not really changed (unless they have been systematically reprogrammed), it is not surprising that the treatment gains achieved in the special setting gradually extinguish within a relatively short time. It should be noted that when the post treatment setting *is* reprogrammed to support the changed behavior, e.g., retraining the receiving regular classroom teachers (Walker, Hops & Johnson, 1975), such decay of treatment gains tends not to occur.

As is obvious from the above review, most of the research carried out to date on the issue of generalization and maintenance has dealt with classroom behavior of an *academically related* nature. This kind of behavior consists largely of following established classroom rules. Studies have consistently shown that this kind of behavior tends to be specific to the setting(s) in which it is produced. That is, if appropriate classroom behavior is produced in one teacher's classroom via exemplary behavior management techniques, there is no guarantee or even any reason to expect that such behavior will generalize to another teacher's classroom. Child behavior tends to be a function in large part of the stimulus conditions and contingencies that exist in whatever setting the child is in. The rule seems to be that *What You Teach is What You Get!* and *Where You Teach It is Where You get it!*

Even more depressing is that improved classroom behavior does not seem to naturally maintain over time when the support procedures used to produce such gains are removed. Teachers expect that gains produced by specialized intervention procedures would become "entrapped" and internalized by the handicapped child thus allowing the removal of such procedures. At this point, we do not know how long such procedures must be applied before this critical point is reached.

It is apparent that findings in these two areas are very depressing to educators in general and especially to classroom teachers. However, given the available data base they seem to be quite conclusive for both handicapped and non handicapped children.

The resource room has proved to be increasingly popular in the last five years, especially for responding to the academic needs of handicapped children. Indications are that it will prove to be even more popular as a response to the mandates of 94-142, e.g., handicapped children will be mainstreamed with regular teachers relying heavily upon resource rooms to provide intensive instruction in basic skills areas. If so, it is essential to carry out studies which will document the extent to which academic skills taught in the resource room impact upon academic performance in the regular classroom or other setting. In the author's estimation, we will see much greater evidence of generalization than has been true of classroom behavior. For example, it is possible that academic gains produced in one setting would show evidence of generalization across settings and also prove to be durable over time, especially if the academic skills mastered were used in subsequent areas of academic responding (Neubauer, 1977).

As noted, there have been very few studies of the generalization and maintenance of improved social behavior. However, recent research by the author and his colleagues at CORBEH (Center at Oregon for Research in the Behavioral Education of the Handicapped), carried out on both social withdrawal and social aggression, indicates that much greater generalization/maintenance effects occur with improved social behavior than with academic behavior. It is possible that social behavior gains become "entrapped" because they are reinforced naturally by the child's environment, e.g., his/her peers. That is, if a handicapped child is taught to initiate and respond positively to others they in turn are likely to reciprocate and to initiate and respond positively to the handicapped child. Interactive behavior is highly reciprocal (Greenwood, Walker, Todd & Hops, 1977) and ***behavioral reciprocity*** may prove to be the key variable leading to the generalization and maintenance of social behavior gains. Some evidence for such an outcome was suggested in a study carried out by Baer and Wolf (1970).

It is absolutely essential that educators in general and especially child study teams *not* assume that child gains in classroom, academic and social areas of functioning will automatically generalize and maintain. If this assumption *is* made, service providers are likely to be greatly disappointed in the results of their efforts and the handicapped child may end up being partially blamed for being unresponsive to instructional/intervention procedures. This in turn could cause service providers to extinguish and "give up" on the child or reduce their level of effort toward him/her. Either outcome would be extremely unfortunate for handicapped children and the mainstreaming movement.

It is strongly recommended that child study teams and IEP managers plan systematically for the absence of generalization/maintenance effects in child performance and behavior. That is, in developing and implementing IEPs, teams should assume that these effects won't occur automatically and implement the procedures necessary to produce such effects. The reader is referred to the studies cited above for information on specific techniques for achieving such generalization and maintenance effects. A more recent source by the present author (Walker, in press) deals specifically with these issues in the general area of classroom management.

Establishing and Maintaining Quality Control of Implementation Efforts

As a starting point, it is essential that child study teams develop educational plans that are feasible, realistic and that do not overburden teachers. Clearly, extra effort will have to be expended by teachers and service providers in the IEP implementation process, however the amount of effort expected of teachers must be tempered by realistic consideration of the demands of teaching. The above are necessary but not sufficient conditions for insuring quality improvement efforts by service providers.

IEP managers must first insure that service providers have the skills necessary to implement their portion of the child's program both correctly and effectively. If they do not have the skills, they must be taught and their application of them supervised by the IEP manager until mastery has been demonstrated. Next the IEP manager must monitor and facilitate the consistency and quality of the service provider's implementation efforts over time.

It is highly probable that the behavior of service providers with respect to the issues of generalization and maintenance will show the same effects as does child behavior. It has been the author's experience that changed teacher behavior tends not to generalize and not to maintain automatically as a matter of course. Given the powerful impact of teacher behavior upon child behavior (Brophy & Good, 1976, 1974; Good & Brophy, 1970, 1971, 1972, 1973, 1974) it is likely that gains in child behavior produced by changed teacher behavior would not maintain if the teacher's behavior did not maintain.

The author recently conducted a literature review on the topic of generalization and maintenance of changed teacher behavior in the area of classroom management skills, (Walker, 1977). The available research studies on this question are extremely limited both in scope and number. However, given the knowledge base available, there is no reason to expect that teacher behavior is any different from child behavior.

If this is in fact the case, then child study teams and especially IEP managers must take this fact into account in both the planning and implementation processes. There are no easy ways of achieving such goals with respect to teacher behavior. At present, we do not even have an effective technology for training teachers and changing either their instructional or management behavior. We are even further away from an effective technology for insuring the generalization and maintenance of *changed* teacher behavior.

The author recommends a frequent schedule of program monitoring for the teacher(s) and the handicapped child. Performance data collected on the handicapped child *must be the final criterion* for determining the quality of the service provider's implementation effort(s). It is clearly important to focus upon the service provider's implementation behavior during the monitoring process and to emphasize its importance in determining desirable outcomes in child behavior.

It may be necessary to use more direct procedures such as prompts, verbal instructions, feedback praise, encouragement or external motivational consequences (teacher course credit, reduced loads, etc.) to maintain the teacher's implementation effort. P.L. 94-142 greatly increases the work loads of educators, especially regular educators in relation to handicapped children. Yet is does not address the issues of how to motivate educators to achieve its mandated goals or how to compensate them for effort expended in this process. LEAs, SEAs and the federal government may have to address this issue systematically in the future if stated goals are to be effectively achieved.

Coordinating Systematic Implementation Efforts Across Personnel and Settings

The coordination of consistent and high quality implementation efforts across service providers and settings is an extremely difficult task. It is apparent that in the majority of cases, a variety of individuals will be involved in the planning and implementation of IEPs for handicapped children. The more individuals there are involved in implementation of the child's program, the more difficult it is to achieve consistency of application. Inconsistency of application across service providers will usually be reflected in the handicapped child's performance in an undesirable way. Such inconsistency can greatly reduce the effectiveness of even the best planned and individually tailored educational program.

The greater the severity and complexity of a handicapped child's problem(s), the more likely it is that multiple individuals will be involved in program implementation. Further, there seems to be an ever increasing trend toward departmentalization and specialization in schools, even in the primary grades. These conditions require systematic coordination of instructional/implementation efforts among all those responsible for providing services to the handicapped child. The IEP manager's role is ideally suited to this task and it is recommended that whenever multiple service providers are involved, the IEP manager develops a strategy for achieving such coordination. A suggested strategy is presented below.

As a starting point, it is absolutely essential that *all* service providers be involved in the IEP planning process. Initially, in the formation of a child study team it may be impossible to anticipate all service providers who may eventaully be involved in the child's educational program. If it becomes apparent in the planning process that non child study team members will be providing services in the program's implementation, they should be added to the team as soon as possible.

It is important that the child study team develop a comprehensive IEP that responds to all of a child's needs, or to as many identified needs as is possible given available services. The planning process should specify which individuals are to provide which services for the purpose addressing identified child needs. The IEP chairperson and manager should be able to provide a clear rationale for: (1) each service to be provided, (2) its relationship to other services and (3) its role in achieving overall goals of the total educational program. If this is done, the individuals involved will see themselves as problem solvers in an integrated approach to providing for a handicapped child's needs rather than as isolated service providers.

The role of each service provider in the implementation process and the specific tasks they are to perform or execute should be specified carefully. The author recommends that these roles and responsibilities be discussed thoroughly as part of the planning process. An optional procedure would be to develop a written contract that describes each person's role and is signed by all parties involved. In this way, one's specific involvement is clearly identified and service providers are aware of the specific tasks each is to perform in the child's program. Significant changes in the child's program or in the roles and/or tasks of service providers would require consultation of all those involved in the program.

It is important that all service providers be in *basic* agreement with the educational plan if at all possible. If some individuals do not agree with the overall plan or with their involvement in it, it will be difficult for them to support the plan and deliver their services in an exemplary fashion. Resolving these problems would involve negotiation, compromise, persuasion and so forth. If resolution is unlikely or impossible, the IEP chairperson and/or manager should identify a different service provider or arrange to respond to the child's need(s) in this part of the plan in some other way. Lack of program support by one or more service providers can have a devastating effect upon the overall impact of an educational program.

After the formal IEP planning process has been completed and IEPs have been developed for each annual goal, the IEP manager should convene a meeting of all service providers to plan overall implementation strategy. An initial meeting of this nature can prevent the emergence of numerous implementation problems later on. It is possible for example, that powerful motivational and/or behavior management techniques will be necessary in the delivery of some or all services to be provided. These areas should be identified and planned for accordingly. Brief inservice training sessions may be necessary before service providers can implement such techniques skillfully.

Even though services to be provided the handicapped child will likely differ in both content and structure, there may be common aspects of the child's functioning that need to be systematically attended to by all service providers, e.g., compliance with adult commands or the suppression of tantruming behavior. If such aspects are identified in advance of implementation and all service providers focus upon them systematically during operation of the program, they can be remediated *very effectively*. This is a compelling reason for scheduling a meeting of service providers to plan implementation strategy.

It is also highly recommended that implementation review meetings be scheduled on a regular basis to assess the program's operation, to identify problem areas and to develop solutions to them. The collective expertise of all involved service providers can be brought to bear upon the solution of such problems. These meetings also make it possible to adjust the program's implementation to take into account the unique performance characteristics and requirements of the handicapped child.

There are two persistent implementation obstacles or problems that can be encountered when multiple individuals are involved in program implementation activities. These are the problems of: (l) varying standards across implementation agents and (2) relaxation of standards over time. Both of these problems impact directly upon the potential effectiveness of an educational program.

Varying Standards Across Implementation Agents.
The goal of the IEP process should of course, be consistently high quality implementation efforts across agents. One should logically expect service providers to vary on such dimensions as skill level, ability to manage child behavior, professionalism, conscientiousness, motivational level and so forth. It

is difficult for an IEP manager to have a significant impact upon some of these factors.

However, it is important that minimum standards of implementation quality be defined by the IEP manager and discussed with all service providers. A set of standards should be developed that are feasible, realistic and subscribed to by everyone concerned. These standards would then be used by the IEP manager as guidelines for evaluating the quality and correctness of implementation efforts.

Relaxation of Standards Over Time.
An even more commonly encountered problem than varying standards is the gradual relaxation of standards over time. Often, extensive effort will be expended by service providers in the early stages of program implementation. As is expected, the level of effort becomes gradually reduced over time. This is appropriate if the child responds well to the implementation process. However, it is often correlated with a subtle relaxation of implementation standards which will lead eventually to deterioration of gains achieved in the child's functioning.

The IEP manager has a crucial role to play in responding to this problem. Service providers are usually not aware that their standards are changing and effects upon child behavior may not be immediately obvious. The IEP manager should monitor the implementation efforts/standards of service providers on a regular basis and provide them with feedback and assistance as necessary to maintain them at minimum levels of quality.

Dealing with Attitudinal and Philosophical Objections to Implementation Procedures and Requirements

Numerous attitudinal and philosophical objections are commonly encountered in the educational setting to the use of specialized techniques with certain children and to the requirements which must be met in providing for their needs. These objections, if not dealt with effectively, can have a very negative effect upon implementation processes and ultimately upon the services provided to the child.

Traditionally, regular educators have accepted responsibility for educating children who are approximately + or - one standard deviation from the mean on such variables as intellectual, social, behavioral and academic functioning. Many children falling outside this range have been the traditional responsibility of special education. Now regular educators are being encouraged *and* pressured to accommodate a much greater range of variation on these dimensions of child functioning. Regular educators have been and will continue to be reactive to the impact of these changes upon their teaching/management routines. Philosophical and attitudinal objections to the use of special education procedures and to the level of effort required in their effecitve application are frequently a part of this reactivity. Many of these objections are based upon assumptions about child behavior and human behavior in general that are not true or only partially true. As a result, expectations are held in some instances regarding how handicapped children should respond that are unrealistic.

The following issues are frequently the basis for such objections: (1) special treatment of a single child; (2) work pressures generated by handicapped children; and (3) the responsiveness of handicapped children to instructional and management procedures. The perspectives of teachers on these issues will have a significant impact upon their response to handicapped children. It is very important for teacher support to present counter arguments when these objections are encountered. The IEP manager's advocacy role for handicapped children requires that he/she be able to present counter arguments skillfully. Each of these issues is discussed briefly below.

Special Treatment of Single Child

Many educators feel that individual children should not receive special treatment of any kind. Teachers are, as a rule, strongly committed to the fair and equitable treatment of all children. However, this view assumes a certain level of equal capability among children that does not always hold true.

For example many low functioning handicapped children require extraordinary amounts of special instruction, treatment, feedback and attention in order to progress satisfactorily. When such children are integrated into regular classroom settings, their educational needs place heavy demands upon classroom teachers. In effect, a specialized individual program must be implemented for the child that is different in quality, content and organization from that provided to other children in the class. In order to benefit from placement in the regular classroom, many low functioning handicapped children will require very unique, specialized treatment.

When such objections are encountered in relation to handicapped children, a powerful case needs to be made for the necessity of true individualization by support personnel. This would be an appropriate role for the IEP manager or chairperson of the child study team to assume.

Work Pressures Generated by Handicapped Children.

There is no question that the placement of handicapped children in less restrictive environments creates extra work pressures for service providers in those settings. Many educators are very reactive to these burdens and in many cases are reluctant to accept low functioning children. It must be noted that such reluctance is also often a function of lack of confidence by service providers that they can accommodate the child and provide for his/her needs.

Again, support personnel such as the IEP manager must serve as advocacy function when this objection is encountered. A strong case needs to be made for why the child should be given access to the less restrictive setting, assuming that it is an appropriate one. The teacher or service provider must be given adequate support, assistance and training, if required, to effectively respond to the child's needs.

Given that these conditions are met the chances are increased that such placement will be a positive experience for both the teacher and handicapped child. As regular educators gain experience with handicapped children and become more skilled in providing for their needs, such resistance is likely to decrease.

The Responsiveness of Handicapped Children to Instructional and Management Procedures.
Handicapped children are often less responsive to instructional and management procedures then are normal children. Regular educators should be carefully prepared for this fact when integration of handicapped children is considered. Expectancy levels of teachers in relation to the performance of handicapped children could have a significant impact upon the adjustment and achievement of handicapped children in less restrictive settings. Unless steps are taken to prevent it, the implementation efforts of service providers could be reduced or attenuated by perceived unresponsiveness of handicapped children.

Concluding Statement

As is obvious from the material presented in this chapter the author believes that the IEP manager's role is crucial to the successful implementation of IEPs for handicapped children. Given the complexities involved in having multiple individuals involved in the planning and implementation of IEPs for handicapped children, it appears that this position will be required to achieve the necessary coordination of resources and services provided. This individual can perform three essential functions in the IEP implementation process: (1) serving as an advocate for the handicapped child; (2) supervising the implementation process and providing technical assistance where needed; and (3) serving as a liason between service providers and the child study team. There will be a direct relationship between how well these tasks are performed and the quality of service delivered to the handicapped child.

Best Practice Standards

I. Appoint an IEP manager to coordinate implementation of the total service plan.

II. Insure that instructional/intervention procedures are applied systematically to all areas of child functioning in which growth or change is expected.

III. Use both direct *and* indirect instructional/intervention procedures whenever appropriate and feasible.

IV. Use systematic motivational procedures to facilitate child achievement and improvement whenever appropriate.

V. Build in *formal* procedures to insure the generalization and persistence of achieved treatment effects whenever possible.

VI. Insure that the implementation efforts of *all* personnel involved in the IEP process are systematically coordinated.

VII. Be aware of and prepared to deal with the impact of attitudinal and philosophical objections upon the educational practice of teachers and other service providers.

Chapter V: Conclusions and Implications for Educational Practice

The IEP provision of P.L. 94-142 will produce massive changes in traditional educational practice with respect to handicapped children. The effective implementation of the IEP provision will require both an increase in resources available to LEAs and a more cost effective use of available resources and services. Presumably as full implementation of the law is achieved, additional resources will be made available to LEAs. However, they may not be adequate to the task of coping with the requirements imposed by the law. For the forseeable future at least, the answer to this problem seems to be in a more effective use of existing resources. It will be necessary to redesign current service delivery systems in order to improve their cost-effectiveness.

Traditionally, special education and related services have served regular educators in a supportive, facilitative capacity. Until recently, direct child services delivered via the individual casework method was the primary service delivery vehicle used by special education and school psychological services for responding to the special instructional and management problems of regular educators (Kennedy & Seidman, 1972; Stuart, 1972). This approach usually examines the child, rather than the environment, for causal factors and for keys to resolving the referral problem(s). As a rule, the child is tested and diagnosed and a treatment plan or recommendation for treatment are developed which are frequently designed for implementation in settings external to the regular classroom.

It has been suggested that the individual casework service delivery approach can negatively reinforce classroom teachers for referring children who are handicapped, learning disabled and/or disruptive by leading to their eventual removal from the classroom (Brown, 1972; Hall, 1971). Such children often place severe pressures upon the instructional and management skills of regular classroom teachers. Referral of these children to special education or school psychological services has frequently resulted in one of the two outcomes: (1) the child is referred to an outside agency for further evaluation and/or treatment, (2) a treatment plan is developed for implementation within the school (or home) but is external to the regular classroom, e.g., assignment to a special or resource classroom. Moreover, the evaluation process confirms the expectation that the child is handicapped or disabled in some way that accounts for the failure to perform adequately. Such outcomes either take the child off the teacher's hands for a period of time or communicate that the teacher is not really responsible for the performance deficit(s). It is not surprising then that teachers have continued to refer difficult to teach children for special services at a very high rate.

A number of educators and psychologists have argued persuasively that the current service needs of handicapped children are overwhelming and cannot be met adequately through the traditional individual casework approach (Heath, 1973; Kennedy & Seidman, 1972; Stuart, 1972). Evidence supportive of this position seems to be growing. For example, Kennedy and Seidman (1972) note that in a Florida school system between 11,900 and 17,850 children qualified for psychological services on a yearly basis. However, using the traditional casework approach, the district was able to process only 2,300 to 2,400 of these referrals per year. Further, Barclay (1970) reported a study in which classroom teachers expressed massive dissatisfaction with psychological services in a large metropolitan area partly because teachers in the sample felt such services were unresponsive to the needs of referred children. Kennedy and Seidman (1972) suggest that few school districts will ever be able to respond adequately to such service needs using an individual casework approach given its cost inefficiency and the lack of trained personnel available to implement it.

Pressures are also increasing for schools to respond to a much larger range of handicapped children whose problems are more severe than those encountered in the past. This trend has been mandated by recent court decisions and the advent of Public Law 94-142 which legally established that *all* handicapped children are the educational responsbility of school systems. Parent and advocacy groups are also demanding higher quality services for handicapped children and that they be educated whenever possible within mainstream settings.

The implications of these developments for the regular classroom teac[illegible]d current educational practice seem obvious. Traditionally, many teachers have been unable to respond adequately to the problem of handicapped children in their classes. Referrals for special services have often resulted in the child's removal from the classroom. In the future, however, this problem will be compounded by (1) a decrease in external treatment(s) and (2) by the introduction of much larger numbers of handicapped children into regular classrooms, many of whom have more severe handicapping conditions.

The necessary technology for effectively educating handicapped children in regular classroom settings exists. Both instructional (Becker, Engelmann, & Thomas, 1976) and behavior management (Haring & Phillips, 1972; O'Leary & O'Leary, 1972; Walker & Buckley, 1974) systems are available for responding effectively to the needs of mainstreamed handicapped children. Unfortunately, the great majority of classroom teachers are not trained in this technology. If handicapped children are to be educated effectively in mainstream settings, regular classroom teachers will need to acquire more technical and complex skills in the areas of instructional programming and behavior management.

It seems obvious that more efficient service delivery systems need to be developed that will accommodate a much larger number of children and that will build toward the actual prevention of school adjustment problems and learning failure. Berry (1972) and Stuart (1972) have suggested that the most effective response to the current service needs pressures is the replacement of direct services to children with consultative services to teachers. To the extent that classroom teachers can be trained effectively in the systematic application of behavioral principles and in exemplary instructional techniques, the range and diversity of children that can be accommodated in the regular classroom settings can be increased. Effective teacher training delivered via a consultant model can reduce the need for ancillary supportive services and may also contribute to the eventual prevention of some instructional and management problems.

The exact logistical means for achieving this goal are not immediately obvious. However, it seems apparent that different variations of inservice education will continue to play a major role in such training effort. Further, there will likely be a significant increase in the use of teacher consultants (school psychologists, resource teachers, diagnostic-prescriptive teachers, counselors, social workers and so forth) to provide technical assistance to classroom teachers in the process of educating handicapped children.

In this kind of service delivery system, the teacher is the primary agent who implements specific techniques and strategies for responding to a child's learning and behavioral needs. Classroom teachers will need to demonstrate both conceptual *and* behavioral mastery of such techniques and strategies if they are to have the desired outcomes. As noted earlier, monitoring and supervision will also have to be provided by consultants until teacher skills are adequately developed and can be self-maintained.

These changes in service delivery system will not be easy to produce and will require redefinition of staffing patterns and massive inservice training efforts. However, they are critical to a successful response to the requirements of P. L. 94-142. The extent to which they are feasible and acceptable to regular educators will have a significant impact upon implementation of P. L. 94-142 and the IEP provision.

As presently constituted the IEP provision is not in the author's opinion adequate for achieving the goals and functions Congress intended for it. Only if LEAs respond to the letter *and* spirit of the law with special attention given to the implementation process will these goals be effectively realized.

The IEP provision is a significant milestone in the education of handicapped children. However, there are some problem areas that must be avoided or responded to effectively if it is to result in the true individualization of programming efforts for handicapped children in less restrictive settings. These are:

(1) Obstacles to the meaningful involvement of parents in the IEP planning and/or implementation process.
(2) Pressures to routinize the IEP process and achieve only "paper compliance" with the IEP legislation.
(3) Reactivity by regular educators to the work load pressures and burdens created by the instructional/management requirements of handicapped children.
(4) Lack of the necessary technical skills among regular educators for coping with handicapped children's needs.
(5) Biases and improper perspectives relating to the performance levels of handicapped children.
(6) Inadequate supportive services necessary for providing teachers with the assistance they need in educating handicapped children.

Many of these problems were described by Weatherly and Lipsky (1977) in their study of the implementation of Chapter 766. They are also likely to operate, perhaps even on a more massive scale with P. L. 94-142. If LEAs recognize these potential problems and take systematic steps to either prevent or ameliorate them, handicapped children will be much better served over the long term.

The material and recommendations presented in chapters two and three on procedures corresponding to both the letter and spirit of the IEP provision are regarded as exemplary and best practice procedures. The material in chapter four is designed to be of assistance to LEAs in achieving best practice status. Achieving such status is one of the most significant challenges currently facing LEAs.

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SECTION IV

A Planned Change Approach to the Implementation of the IEP Provision of P.L. 94-142

Patricia H. Gillespie

GILLESPIE-SILVER, PATRICIA. Dr. Gillespie-Silver, former Associate Professor of Learning Disabilities at Indiana University in Bloomington, is currently serving as educational consultant to the IEP Training Project and Boston School Project for the Boston Public Schools. She is also conducting a series of workshops on IEPs for the Child Service Demonstration Center at Indiana University, Bloomington; the Kentucky State Department; and the National Learning Disabilities Assistance Project (NaLDAP) in Andover, Massachusetts. Dr. Gillespie-Silver received her doctorate from West Virginia University in 1970 where she studied Reading and Special Education with emphasis on mental retardation and learning disabilities. She has authored numerous publications in the areas of mental retardation, learning disabilities, special needs and sex stereotyping. Her research and training interests focus in the fields of reading, learning disabilities, sex stereotyping and special education.

ABSTRACT

Although local educational agencies (LEA's) may meet the requirements of PL 94-142 by following due process procedures, writing educational programs for all handicapped children, and monitoring the child's progress annually, they may not fulfill the spirit of the law, which embodies the commitment to provide quality services so that each handicapped child has the opportunity to meet his/her potential. To reach this goal, LEA's must view meeting the needs of the handicapped as a developmental process that utilizes systematic planning for the best educational services for all children. Within LEA's, individualized education plans will reflect a continuum of services that will, at one level, meet only the requirements of the law, and on other levels, reflect a process that develops internal capabilities for maintaining changes and for solving problems internally.

A self-study guide that utilizes criteria for a systems approach to planned change is the basis of this paper. Criteria are presented for the following dimensions: (1) implementing the planning, implementation, review, and revisions for individualized education programs; (2) maximizing present resources within LEA's and developing new modes of delivery for solving problems; and (3) seeking external and internal resources for the multiple exchange of information and services, developing procedures for collaborative problem-solving, and evaluating for the purposes of self-analysis and self-renewal.

> But always the surest guarantee of change and growth is the inclusion of living persons in every stage of an activity. Their lives, their experience, and their continuing response– even their resistances –infuse with life any plan which, if living participants are excluded, lies on the drawing board and loses its reality.
>
> Margaret Mead

INTRODUCTION

Change is inevitable. While many changes occur naturally without forethought, other changes are planned. In some instances, planned efforts for change lead to the opposite of the desired outcome. This is especially true if change strategists ignore Mead's observations that all individuals must be integrally involved in as many steps of the change process as possible. Moreover, to be lasting and effective, changes must be initiated within the system and the individual.

One attempt to effect planned change for the benefit of some members of our society is PL 94-142, the Education for All Handicapped Act. This law represents the culmination of many interested persons' efforts to meet the educational needs of the handicapped; yet, the mere passing of a law will not guarantee that handicapped persons' needs will be met. Political coersive power is an external force that may not ensure the initiation of thorough-going changes within the system or the individual.

Although the letter of the law represents an extrinsic motivation to effect change in the educational services for the handicapped, the intent of the spirit of the law is that all those affected by the needs of the handicapped be intrinsically involved in and committed to the planning, implementing, reviewing, and revising of the handicapped individual's individualized education program (IEP's). If the members of an educational agency wish to do as much as possible for the handicapped, they will go beyond the letter of the law. On the other hand, if members of the system choose to meet their own needs (e.g., maintaining their present status), at the sacrifice of the handicapped, they will merely go through the ostensive changes required by law. The choices are either an exciting interchange of resources by all those involved or a reluctant initiation of the development of meaningless forms and documents.

This paper presents a systems approach to planned change for (1) defining and analyzing the letter and the spirit of the law, and (2) providing criteria for the processes and documents utilized by local educational agencies (LEA's) in the implementation of IEP's.

There is relatively little difficulty in defining the letter of the law. Interpreting rules and regulations is generally a matter of policy. Of course, final decisions on controversial interpretations can be decided by the courts. Interpretations of the spirit of the law are more elusive. For the purposes of later analysis, a working definition of the spirit of the law is presented. By this definition, the spirit of the law is the logical extension of the law's intended purpose. In this case, the law is intended to assist in the provision of an appropriate public education for all handicapped individuals ages three to 21; therefore, the spirit of the law is fulfilled if handicapped individuals are helped to develop to the fullest of their capabilities.

This goal can be achieved only if LEA's constituents are personally committed to individualized education for the handicapped and do as much as possible to aid the handicapped individual, even to the extent of exceeding the minimum requirements of the law.

Section One presents types of strategies for change, the relationship of these strategies to the implementation of PL 94-142, and concepts related to systems in change. Section Two is an analysis of the letter and the spirit of the law *vis-a-vis* the principles presented in the first section and includes criteria for developing IEP's. The last section presents specific criteria for the formats for IEP's documents. These criteria can be used as self-study guides for LEA's attempting to meet the letter and spirit of the law.

CHAPTER I: STRATEGIES FOR PLANNED CHANGE: AN OVERVIEW

If LEA's are to be successful in meeting the needs of the handicapped as outlined by PL 94-142, self-initiated, systematic efforts toward changes within the system are necessary. To analyze the effects of planned change on human service delivery systems, several types of change strategies are presented. Of these strategies, the normative-re-educative is discussed in detail as it serves as a theoretical basis for process and format criteria presented in subsequent sections. Also presented, for later application, are some principles of system analysis that relate to the LEA's implementation of the IEP process.

Strategies for Change

According to Chin and Benne (1969), several general strategies have been utilized to bring about *planned change*–i.e., changes that are "conscious, deliberate, and intended, at least on the part of one or more agents related to the change attempt" (p. 33). Of these types of strategies, the power-coercive and the normative-re-educative are most related to the implementation of the IEP process.

PL 94-142 represents a change attempt that emphasizes the use of political and economic sanctions to effect change. By imposing political and economic sanctions, a group of individuals, e.g., the Bureau of Education for the Handicapped (BEH), can exert "coercive influence over the decision of those to whom it is applied" (Chin & Benne, 1969, p. 53).

One limitation of this change strategy is that it tends to polarize individuals around political and economic issues. Another limitation is that those change agents in power positions may overestimate the capability of this approach to bring about changes within the system. These strategies, while legitimizing some envisioned change, do not ensure that changes will indeed occur (Chin & Benne, 1969).

According to Chin and Benne (1969), these strategies for change are not entirely successful unless the individuals responsible for the implementation of the law are re-educated in new courses of action. This re-educative process may require changes in the "norms, the roles, and the relationship structures of the institutions involved" (p. 55).

Similarly, after analyzing the effects of legal mandates in special education (e.g., PARC and Mills cases and California legislation), Kirp, Kuriloff, and Buss (1975) concluded:

> First, change in legal standards, whatever its source, does not ensure altered school behavior. Judicial policy making is limited, among other factors, by a structural inability to shape disputes, control resources, select among policy alternatives, or monitor or readily revise rulings to adjust to altered experience. Legislatures are also subject to many of the same limitations . . . Second, some changes are easier than others to accomplish through legal mandate . . . Third, resistance to change does not result from the obduracy of misguided school officials. The sorts of changes that PARC, Mills, and the California reforms contemplate would require wholesale re-evaluation of school structures and organizational roles, and consequently threaten everyone in the system (pp. 380-381).

Chin and Benne recommend that *normative-re-educative* strategies be combined with power-coercive strategies to ensure that intended changes as outlined by the law are implemented. Normative-re-educative strategists assume that individuals are "inherently active, in quest of impulse, and need satisfaction" (p. 43). Individuals are considered to be proactive as well as reactive. That is, the individuals within the system, e.g., the LEA, actively select stimuli from the environment in addition to reacting to external stimuli. Moreover, the actions of these individuals are guided by the norms or the cultural setting, e.g., the educational institution. Changes in actions are influenced by the habits and values of the individual at the personal and socio-cultural levels (Chin & Benne, 1969).

Normative-re-educative strategists view their clients as individuals actively seeking a solution to the problem; improving the interpersonal relationships and problem-solving capacities of groups are two important goals of normative-re-educative change agents

The problem-solving strategies, on the other hand, emphasize the cognitive aspects of group processes (Chin & Benne, 1969). Skills in problem-solving are used by the system or organization to enact and respond to necessary changes within the system. Steps in problem-solving have been developed by many investigators. Havelock (1973) described the problem-solving steps to change within a system: (1) An initial disturbance (pressure from inside or outside, crisis, etc.) occurs; (2) There is a feeling of need and a decision to "do something" about the need; (3) The need is diagnosed as a problem; (4) There is a search for solutions; (5) A possible solution is applied; and (6) There is satisfaction that the problem is solved or there is dissatisfaction which results in a repetition of the cycle (p. 7).

These steps in the decision-making process can serve as a process of *self-renewal* which is crucial to the success of the normative-re-educative approach to planned change. If a system engages in problem-solving, it can use its evaluation results for replanning. Self-renewal and problem-solving, according to Havelock (1973), require multiple exchanges with internal and external resources. These interchanges among resource persons, groups, and institutions are termed "networks" by Havelock. The LEA's utilization of multiple external and internal inputs has been described by several special educators. For example, Tracy, Gibbons, and Kladder (1976) use the term *opening systems* to describe such a process. (See section on *Systems in Change*.) Apter (1977) and Wirtz and Seay (1974) apply this process to the development of community special education programs.

For the implementation of the IEP process to be thorough and ongoing, the LEA's members must engage in a systematic review and revision of its activities (self-renewal).

Principles of Changing

Normative-re-educative strategists utilize conscious theories of changing in order to analyze a client system. Benne and Birnbaum (1969) have presented several principles of institutional change strategies:

> —To change a subsystem or part of a subsystem, relevant aspects of the environment must also be changed.
>
> —To change behavior on any one level of a hierarchical organization, it is necessary to achieve complimentary and reinforcing changes in organizational levels above and below that level.
>
> —The place to begin changes is at those points in the system where some stress and strain exist. Stress may give rise to dissatisfaction with the status quo and this will become a motivating factor for change in the system.
>
> —Both the formal and the informal organization of an institution must be considered in planning any process of change.
>
> —If thorough-going changes in a hierarchical structure are desirable or necessary, change should ordinarily start with the policy-making body.
>
> —The effectiveness of planned change is often directly related to the degree to which members at all levels of an institutional hierarchy take part in the fact-finding and the diagnosing of needed changes and in the formulation and reality-testing of goals and programs of change (pp. 330-334).

If the implementation of the IEP process is to be successful, members of the LEA must consider these principles of changing. In Section Two, these principles are represented in the criteria for the process of developing IEPs.

Systems in Change

Underlying these principles of changing is the assumption that implementing changes within systems must include a system-wide analysis. An analysis of the concurrence of goals within the system and the system's relationship to other systems is necessary. For example, according to Kirp, Kuriloff, and Buss (1975), the implementation of legal mandates for the handicapped should focus on the delivery systems for the entire school system as well as those for the handicapped. They note that presently this system-wide coordination appears "nowhere at hand" in the LEA's, and until it does exist, our narrow interventions will certainly fail to initiate thorough-going changes.

Within the rules and regulations of PL 94-142 is the implicit assumption that LEA's must engage in system-wide analysis to meet the needs of handicapped individuals. For example, in order to decide what is the least restrictive alternative for the handicapped individual, the LEA must be aware of the possible external and internal resources available to the system. This system-wide analysis can be conducted *via* the strategies developed by *systems analysts*. Systems analysis enables those professionals involved in human service delivery systems to "identify the determinants of behavior or output of the system and delineate potential forces for effecting change" (Tracy, Gibbons, & Kladder, 1976, p. 11).

Systems Analysis: Definitions, Concepts, and Characteristics

Banghart (1969, p. 25) states that *systems analysis* is "an attempt to define the most feasible, suitable, and acceptable means for accomplishing a given purpose," and a *system* is a "group of interdependent elements acting together to accomplish a predetermined purpose." Several key concepts comprise the characteristics of systems and systems analysis. These are presented in the following sections.

Interactions among subsystems of LEA's.
To analyze an LEA, a systems analyst may consider the *subsystems*, e.g., the special services unit. The interactions among elements of the subsystems contribute to the organizational whole; the total character of the system is more than the sum of its parts (Andrew & Moir, 1970). Also a change in one of the subsystems may change the character of other subsystems as well as the total system.

Chin (1969) notes that because the subcomponents of a system are not the same and are not perfectly integrated, the members of these subsystems will react to changes differently. For example, the response to PL 94-142 may cause stress and tension among such subsystems of the LEA as the special education unit and the regular education services.

Types of Systems.

In defining the components of an LEA system and the IEP system, the systems analyst draws an imaginary *boundary*[1] around specific organizational elements. These arbitrary boundaries around a system can encompass a multiplicity of variables that taken together comprise a system of specific type (e.g., closed systems, open systems, partially open systems, opening systems, and intersystems). Because three of these types of systems are considered in the development of the criteria for developing IEP's, they are described here.

In an *open system* approach, the analyst considers the interactions of the system with the environment in which it is situated. The researcher focuses on readily attainable and observable aspects of the system's environment (Silberman, 1971). According to Tracy, Gibbons, and Kladder (1976), the system is open if there are junctures in the "process where the next step may be chosen from an infinite number of alternatives" (p. 16). Rather than use the term open system, Tracy, Gibbons, and Kladder prefer the term *opening systems* to imply a process rather than an end result. They define the opening system as:

> A system which is 'opening' is one in which a number of alternative settings are available for use by clients of that system . . . Openness simply means the existence of choice or the availability of multiple settings (p. 16-17).

Chin (1969) proposes that change agents utilize an *intersystem* model, defined as "two open systems connected to each other" (p. 304). By the use of connectives (the lines of relationships between two systems) the interactions between the two systems are defined. The relationships are described as conjunctive if they are positive and disjointive if they represent stress or conflict within the system.

The intersystem model guides the analysts in analyzing the "interdependent dynamics of interaction both within and between the units" (Chin, 1969, p. 305). Also, the connectives in a system are studied in order to determine how they are formed, continued, or discontinued. For example, the LEA and the interaction of private agencies would be considered to be an example of an intersystem model. The intersystem model will be used in developing the process and format criteria in subsequent sections.

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[1] Chin (1969) defines the boundary as "the line forming a closed circle around selected variables, where there is less interchange of energy (or communication, etc.) across the line of the circle than within the delimiting circle (p. 300).

Processes of systems.

As stated in the beginning of this section, an LEA can be viewed as a proactive system that coordinates its multiple inputs and outputs from the environment in order to meet the needs of their clients, e.g., the handicapped. Any system can be analyzed according to its *inputs, processes* (throughputs), and *outputs* (Andrew & Moir, 1970; Chin, 1969; Silberman, 1971).

The LEA system's processes for directing the flow of inputs and outputs is continual in that "each year's outputs form some of the inputs for the next year" (Andrew & Moir, 1970, p. 39). A system's explicit and implicit objectives become the outputs of the system, and inputs are viewed as part of the process for obtaining the objectives (output) of the system. Input variables are not affected by the system but may affect the system in some manner.

The system utilizes *feedback* to determine the effectiveness of its inputs and outputs. The term *cybernetics* has been used to describe the process of utilizing internal feedback for purposes of control (Banghart, 1969; Silberman, 1971). An analogous example of this process is the traffic system that monitors and adjusts the flow of traffic by adjustments of the traffic lights.

The process of feedback facilitates the monitoring of the processes utilized by the system. If those involved in the decision-making process utilize their feedback, they will be able to take corrective actions based upon the results.

The decision-making process.

As with the normative-re-educative change strategies, advocates of systems analysis stress the problem-solving or decision-making process.

In a systems analysis approach, the decision maker(s) establishes objectives (outputs) and methods for reaching these objectives (inputs and processes). Decisions made can be considered products or outputs of the system.

The system can be defined by the *kinds* of decisions made by its members; the *bases* for making these decisions; and the *point* at which these decisions were made (Apter, 1977).

In summary, systems analysis is a process for analyzing structures, functions, and feedback within a system (Banghart, 1969; Tracy, Gibbons, & Kladder, 1976). By establishing boundaries around various elements or components of a system, a system analyst examines the internal interactions within the system and its interactions with other systems.

Change agents have stressed the need for analysis of interrelatedness of systems in order to bring about change. According to Sarason (1976), many efforts for change fail because the interveners do not consider the interconnectness within the system.

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Special educators have proposed the utilization of a system-wide perspective in order to meet the needs of the handicapped (e.g., Apter, 1977; Tracy, Kladder & Gibbons, 1976). In this approach, human service delivery systems can be viewed as interrelated open systems that exchange resources to meet the needs of its clients within the community (community being defined as either local, regional, state, or national depending upon the boundaries). The school system is viewed as a community agency that assists in the coordination of multiple inputs on a system-wide or community basis.

In the use of an intersystem approach, the assumption that each agency is an open or opening system is vital. Too often, an agency, e.g., the LEA, attempts to limit its use of internal and external resources, and, in turn, restricts the possible alternatives available for making decisions.

In an open system, the members consider the interaction of the individual, the system, and the environment. Moreover, changes within such systems can be considered to be *developmental* (Chin, 1969). The system is considered to be moving in a specific direction or toward an end state, and changes are considered to be spirial. Although a system may return to the same problem, solutions will be on different levels because members of the system have employed the results of feedback to determine the effectiveness of past proposed solutions.

As an LEA attempts to meet the letter and the spirit of the law, its members will need to establish plans for achieving outcomes (e.g., necessary changes). Gaps between the system's resources and procedures and its goals will be closed as the system develops mechanisms for the coordination and maximum utilization of multiple inputs. The opening system, which implies a process towards a goal, best describes the LEA system as it attempts to meet the letter and the spirit of the law.

CHAPTER II: DEVELOPING IEP'S: A SYSTEMS APPROACH TO MEETING THE SPIRIT AND LETTER OF THE LAW

This section presents criteria for developing IEP's at the system and case levels. The criteria are presented on a continuum: (1) required by law; (2) desirable (i.e., the system is able to maximize present resources and commitment); and (3) ideal (the system may need to acquire additional resources and involvement by all interrelated systems).

Criteria are based on the following principles of planned change:

(1) The system (in this case the LEA) must have a systematic decision-making process that includes the coordination and assessment of

inputs, processes, and outputs for the purpose of self-renewal;

(2) The system must be defined an open or opening system that interacts with other systems in implementing the IEP process;

(3) The system must develop structures, functions, and activities that are based on the principles of changing.

Criteria for Developing IEPs: A Decision-making Process at the System and Case Level

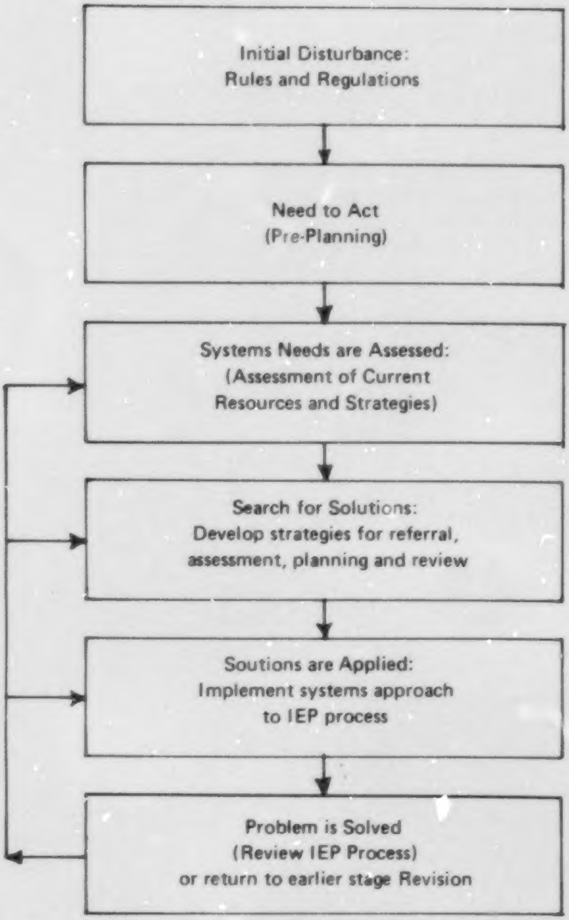
The function of the IEP system is not clearly designated in the rules and regulations. According to Morrissey and Safer (1976), the purpose of the IEP system is open to interpretation. They note that within the context of the law, the IEP can be perceived as:

> (a) a written statement which represents the documentation and commitment of personnel, material, and fiscal resources, (b) a legal document confirming that a process was initiated and general programming decisions were made, or (c) a guide for the implementation of instruction (pp. 1-2).

The IEP document can serve all three functions noted by Morrissey and Safer (1976). The members of the IEP system can participate in the coordination and utilization of resources on a system-wide basis (a total service plan) as well as in the development of an individual instructional plan. The development of the individual plan should not be separated from the total service plan. Such a separation would be to place arbitrary boundaries around each component and perhaps disrupt the continuity of the decision-making process.

On a system-wide and case level, the IEP system can be viewed as a vehicle for engaging in systematic decision-making. On the system level, the LEA, in response to the rules and regulations of PL 94-142, can systematically develop procedures for the planning, implementing, and reviewing of their system-wide approach to IEP's. Such steps as those provided by Havelock (1974) (See Figure 1) are illustrative of the decision-making process at the system level. Inevitably, at the systems level, decisions concerning the IEP process will be made; however, the LEA's approach to this decision-making process can affect the quality and nature of the services for the handicapped. Furthermore, the system's selection of objectives (outputs), resources (inputs), and strategies for obtaining these objectives (processes) will define the IEP system. A crucial component of the system-wide decision-making process is the evaluation of the strategies used for referral, assessment, programming, and review for the purposes of self-renewal. The system's constant renewal of its efforts is necessary in order to prevent the development of a system that requires individuals to adapt to its needs. Through the use of a decision-making process, an LEA can plan for internal changes and also utilize the principle of changing to effect needed changes within the system.

FIGURE 1
SYSTEM-WIDE DEVELOPMENT OF IEPS:
A DECISION-MAKING PROCESS



At the case level (See Figure 2) a decision-making process can also be used. According to Tracy, Kladder, and Gibbons (1976) the development of an IEP is a decision-making process that requires:

1. Collection of data (i.e., assessment, observation, interview, etc.).
2. Formulation of programmatic objectives (multiple but behaviorally specific objectives agreed upon by the consumer).
3. Specification of alternative placements (incorporating the objectives listed with several means of achieving them).
4. Design and implementation of feedback mechanism (collection of continual feedback for professional and consumer as an on-going evaluation).
5. Consultation with other personnel involved with program implementation (p. 36).

In developing and implementing the IEP, the LEA must collect data concerning the child's needs, select alternatives for meeting the child's needs, implement the program and placement choices, and evaluate the effectiveness of these choices via formative and/or summative evaluation of the child's progress, and the participants' (child, teacher, parent, administrator) perception of the success of the IEP.

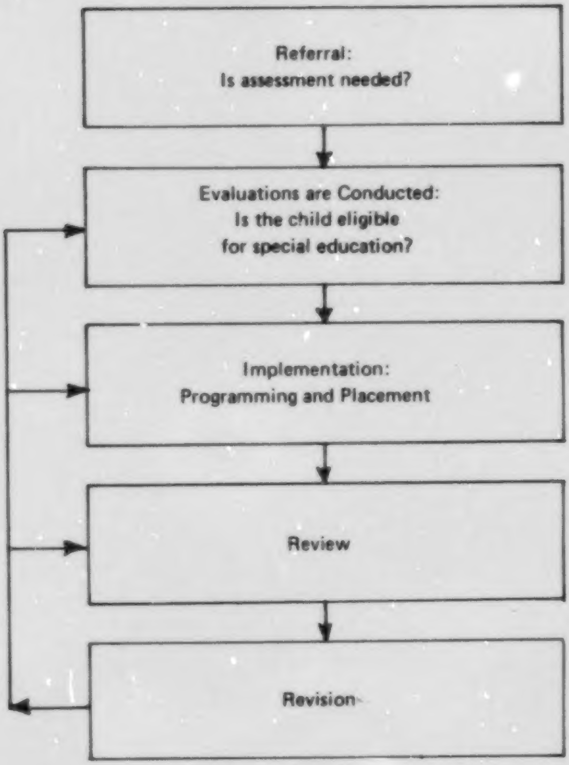
Criteria for the IEP process are presented according to (1) Identifying the problem: Is assessment indicated? (2) Gathering data: Is the child eligible for special education services? What are his/her special educational needs? (3) Developing solutions: Developing the IEP; (4) Implementing possible solutions: Programming and Placement for the Handicapped Individual; (5) Assessing solutions (Review of IEP); and (6) Selecting new solutions or continuing the program (Revision of the IEP). Criteria will be presented at the case and system levels for each stage of the process.

Referral.

The decision-making process at the case level begins at the referral stage. The child is typically referred because there is a lack of congruence between the child's needs and the present program. At the referral stage, the participants in the IEP process must determine the nature of the problem and if special education assessment is necessary.

Because the IEP system (a subcomponent or subsystem within the LEA) is composed of many interrelated systems (e.g., the special service unit, regular educational services) possessing a variety of roles and structures, the choice of participants and their level of participation in the referral process will affect the nature of the system—i.e., the referral subsystem will be defined by these individuals.

FIGURE 2
STEPS IN THE IEP DECISION-MAKING PROCESS: CASE LEVEL



To ensure that referral information is comprehensive and adequately represents the nature of the problem, ideally, all individuals, including the parents, teachers, administrator, and the child, if possible, should be involved. At minimum, the parents should be notified immediately after a referral has been made by member of the school system. The teacher, parent, and the LEA representative must work closely to determine the exact nature of the problem.

In order to assess the bases upon which the referral was made, as much information as possible is needed concerning the problem. For example, information should include: (1) those individuals responsible for referring the child; (2) these individuals' observations in behavioral terms concerning the problem; (3) the child's (if possible), and parent's perceptions of the problem; and (4) the efficacy of prior interventions.

On the systems level, a systematic referral process and means for evaluating its effectiveness should be developed by the LEA. The system can analyze the (1) types of inputs (e.g., comments from teachers, parents); (2) the types of referrals (e.g., child referred for behavior problems); (3) the individuals within the subsystems most often involved in the referral process (e.g., more referrals from teachers than parents); (4) the number of referrals; (5) the number of children referred served by special services; and (6) the time required for the referral process (from date of referral to scheduling for evaluation). Based on information obtained from this evaluation process, the system can revise their referral process, if needed.

Development of IEPs	*Required*	*Desirable*	*Ideal*
1.0 Case Level			
1.1 Referral			
1.1.1 Referral Information			
1.1.1.1 A written referral form should be on file which indicates—			
Name and position of the referring individual	x		
Date of referral	x		
Problem behaviors stated in observable, measurable terms	x		
Attempts made to solve these problems prior to referral, including—		x	
success or failure of these attempts		x	
1.1.2 Participants in the Referral Process: Structure and Roles			
1.1.2.1 One member of the LEA should be responsible for gathering the referral information	x		
1.1.2.2 Parents should have access to the information on the referral form		x	
1.1.2.3 Parents' recognition or lack of recognition of the problem should be noted		x	
1.1.2.4 The student's recognition and/or perception of the problem should be obtained, if possible			x
1.1.3 The Referral Process			
1.1.3.1 Steps and dates for response to the referral should be documented including			
Date referral was received	x		
Name and position of individual who first received the referral	x		
Name and position of individual who suggested next steps		x	
1.1.3.2 Information on the referral form should be provided to all members of the evaluation team		x	

	Required	Desirable	Ideal
2.0 System Level			
2.1 Referral			
2.1.1 Referral Process			
2.1.1.1 An LEA based committee should be formed to examine the law and to develop decision-making strategies for implementing the referral process. These strategies should include—			
What decisions are to be made		x	
Names and positions of individuals chosen to make these decisions		x	
Names and positions of individuals responsible for making these decisions		x	
Data to be collected (e.g., number and nature of referrals)			x
Persons responsible for collecting data			x
Recording formats for data			x
2.1.2 Referral information			
2.1.2.1 Referral information should include—			
Number of referrals for the year			x
Nature or type of referral			x
Persons responsible for referrals			x
Time required for the referral process			x
2.1.3 Participants in the Referral Process: Roles and Structures			
2.1.3.1 Individuals involved in this initial planning of the referral process should be—			
Special education representatives from the local level		x	
regional level			x
state level			x
Representatives of parent organizations		x	
Representatives of teacher associations		x	

	Required	*Desirable*	*Ideal*
Representatives of diagnostic units, e.g., school psychologists		x	
Representatives from community agencies			x
Representatives from ethnic and minority groups within the community			x
Representatives from student groups, including handicapped students			x
Representatives from professional organizations			x
Representatives of policy makers within the school		x	
community			x
state			x

Gathering Data: Assessment: Is the Child Eligible for Special Educational Services? What are His/Her Special Educational Needs?

If the handicapped child is being evaluated for the first time by the public agency, a member of the evaluation team or a representative who is knowledgeable about the evaluation procedures must attend the planning meeting(s). The representative's speciality area will depend upon the child's suspected disability, e.g., the speech and language-pathologist. The implicit assumption of this requirement appears to be that to determine the needs of a handicapped child, the system must "evaluate" the individual in some manner. Furthermore, this evaluation is considered to be a *team effort* rather than the role of one individual. It is also implied that other participants in the IEP process should be aware of the procedures for evaluation and the types of tests administered in order to be able to assess the validity and reliability of the information.

The evaluation team appears to represent a system that is separate from the other systems (e.g., planning and programming) and from the other participants within the IEP system. From a system's perspective, it is difficult to describe the components of the evaluation *system* because the rules and regulations do not clearly specify who could or should be on the team.[1]

[1] If the "child's primary handicap is a speech impairment, the evaluation personnel participating under paragraph (b) (1) of this section would normally be the speech-language-pathologist".

Because the evaluation team can be comprised of individuals other than the classroom teacher or the parents, it is possible that the evaluation system's arbitrary boundaries could prohibit maximum interaction with representatives from other systems (e.g., the regular education program).

As stated previously, evaluations are to be conducted by a team rather than one individual. The team approach has been cited for its advantages. Drucker has stated:

> Everybody always knows the work of the whole and holds himself responsible for it. It (the team) is highly receptive to new ideas and new ways of doing things. And it has great flexibility (p. 567).

The team approach, according to Drucker, is superior to a functional organization which can be described as a complex formal structure with simple work roles (Trist, 1969). In the functional organization, individuals are likely to make a commitment only to his/her tasks and to have a limited number of varying social interactions on the job (Trist, 1969).

The team approach, on the other hand, is a "composite system that combines a simple formal structure with complex work roles" (Trist, 1969, 273). This arrangement facilitates commitment to the "whole group task" (Trist, 1969, 274); the individual participates in a number of tasks with different members of the groups.

The participants in the evaluation process could possibly interact according to either of the organizational structures – i.e., the team approach or the functional organizational approach. For example, the evaluators may have specific tasks to complete and may conduct their evaluations without soliciting input from other team members. In contrast, evaluators may work together to plan evaluation procedures and tests (tasks) to be completed. If the LEA chooses the former organization structure, they will be less likely to ensure comprehensive evaluations of the child's needs.

The LEA should develop procedures that assure maximum coordination and participation of team members. According to Drucker, because often team members lack clarity and stability, the team approach requires "continual attention to its management" (p. 567). The greater possibility of multiple inputs (which is the case with the team approach), the more likely that the group will have "divergent subgroup perspectives" (Perrow 1972, p. 153).

To ensure comprehensiveness in assessment procedures, the evaluation leader must encourage maximum participation from the team members. Furthermore, s/he must monitor continually the activities of the group. Also, because the group may not have a sense of clarity or stability, its members should engage in constant discussions concerning their purpose and procedures (Perrow, 1972).

Developing IEPs	*Required*	*Desirable*	*Ideal*
1.0 Case Level			
1.2 Assessment			
1.2.1 Participants in the Assessment Process: Structures and Roles			
1.2.1.1 A team should consist of at least three members		x	
1.2.1.2 Professional members of the evaluation team should be certified in their designated area of assessment		x	
1.2.1.3 Parents may participate in the evaluation process by— being informed of the reasons for assessment, the use of the results, the nature of the assessment, the assessment procedures, names and positions of individuals conducting assessment, where the assessment will occur, and amount of time required for the assessment	x		
approving the assessment procedures	x		
providing information concerning the child's developmental and medical history		x	
suggesting additional assessment procedures		x	
being included in the pre-assessment meeting(s)			x
being involved in the evaluation procedures by observing during formal assessment			x
gathering data *via* behavioral observations, informal tests, criterion and standardized tests supervised by a qualified member of the evaluation team			x

		Required	Desirable	Ideal
	being involved in post-evaluation meetings and reacting to the validity and reliability of results			x
1.2.1.4	The handicapped child's teacher should be involved in the assessment procedures by —			
	being informed of the assessment procedures and the tests to be administered		x	
	participating in pre-evaluation meetings		x	
	previewing all assessment data on the child		x	
	participating in assessment procedures, e.g., conducting informal assessments, keeping a log, interviewing the child, using rating scales, checklists			x
	being involved in the post-evaluation meetings to discuss the reliability, validity, and relevance of the results			x
	suggesting next steps for assessment, if necessary			x
1.2.1.5	The handicapped individual should participate in the assessment procedures by —			
	being informed, if possible, of the assessment procedures, especially if s/he			
	has the receptive capacity to understand the activities		x	
	can assess his/her own educational needs for present and long-term goals, e.g., prevocational skills		x	
	suggesting areas of concern			x
	participating in the pre- and post evaluation meetings			x

1.2.2 Assessment Information

		Required	Desirable	Ideal
1.2.2.1	Assessment information should be from multiple resources, including several from the following—			
	standardized tests that are considered to be reliable and valid		x	
	and in the child's own language	x		
	rating scales		x	
	checklists		x	
	interviews			x
	informal tests		x	
	informal and formal observations			x
	commercial and informal criterion tests		x	
1.2.2.2	The data to be collected should include —			
	the health status of the child		x	
	the previous interventions and their results		x	
	names of agencies involved in prior assessments		x	
	educational levels in specific areas of concern, e.g. self-help skills, math, reading, social adjustment, motor-development	x		
1.2.2.3	Evaluation results should be relevant to the child's present needs (related to the child's functioning in his/her environment)		x	
1.2.2.4	An intelligence quotient should not be the primary piece of data for decision-making		x	

	Required	Desirable	Ideal
1.2.3 Assessment Process			
1.2.3.1 At least one member of the professional evaluation team should be responsible for communicating with the parents during the assessment process		x	
1.2.3.2 One assessment team leader should be responsible for—			
collecting all the data		x	
obtaining release forms		x	
conducting the meetings		x	
1.2.3.3 The assessment team leader should conduct a pre-assessment meeting at which the following items should be considered—			
the referral form		x	
needed information		x	
procedures for collecting information		x	
individuals responsible for collecting the information		x	
a format for subsequent assessment meetings		x	
1.2.3.4 A record of the pre-assessment meeting should be filed and should include:			
the guiding questions for the assessment		x	
individuals responsible for the assessment		x	
the parent's signature for approval	x		
1.2.3.5 A post-evaluation meeting should be held to —			
discuss results			x
reach a consensus			x

		Required	Desirable	Ideal
	identify next steps, possible resources, and additional evaluations, if necessary			x
1.2.3.6	If a member of the evaluation team does not approve the group decisions, s/he should file a minority report		x	
1.2.3.7	Initial evaluations should be considered tentative rather than a comprehensive assessment of the child's need		x	
2.0 System Level				
2.2 Assessment				
2.2.1 The Assessment Process				
2.2.1.1	The system should identify prospective professional evaluatin team members who should meet to discuss—			
	possible procedures		x	
	roles		x	
	tasks		x	
	philosophies			x
2.2.1.2	A sequence of activities and time lines should be recorded on a master sheet by one individual in order to monitor the progression of the assessment activities			
2.2.2 Participants: Roles and Structures				
2.2.2.1	Assessment teams should rotate leaders			x
2.2.2.2	Assessment team members should consist of professional evaluators, teachers, the parents, and the child, when appropriate		x	

Programming and Placement

After the evaluation team has collected its results and established next steps, a meeting or a series of meetings can be conducted to develop the IEP, including the steps and procedures for implementing and reviewing the IEP. Criteria are presented for the participants in this process, the information needed and generated by this process, and the process itself (e.g., conducting the meeting, organizing and sharing the information.

Participants: Roles and Structures: LEA Representative.
As stated earlier in this paper, the boundaries of the system may be determined by the individuals selected by the public agency and/or the parents to participate in the planning meeting(s). Each participant's role will be reviewed separately.

According to the rules and regulations, a "*representative* of the *public agency*, other than the child's teacher, who is qualified to provide, or supervise the provision of, special education" must attend the meetings (121 a. 344a). An LEA may meet these requirements in several ways and the alternatives it chooses may affect the quality and nature of the child's IEP.

From a managerial or system-wide perspective, this LEA representative should be able to provide information about present or possible alternative delivery systems on the local, regional, state, and national level. Because it is assumed that this individual will be assigned the responsibility of initiating or conducting the meeting(s),[2] s/he should be able to serve as a *linker* of the internal and external resources of the interrelated systems that participate in the IEP system.

Because the individual must be qualified to supervise *or* provide special services, a system can choose an LEA representative who is (1) qualified to supervise special services but not qualified to provide them, e.g., the assistant superintendent in charge of curriculum or a building principal; or (2) qualified to supervise and provide special services, e.g., a special services director or a part-time director, part-time teacher; or (3) qualified only to provide services in the child's suspected disability, e.g., a special teacher, consultant, speech-language pathologist etc.

The LEA representative may be chosen according to the nature of the handicapped child's needs, the structures of a system (e.g., a small rural system may not have special services director), or state requirements concerning supervisory qualifications.

The IEP Process may be significantly affected by the position of the individual(s) selected by the public agency and LEA representative within the LEA system. For example, if the representative is the assistant superintendent in charge of special services, s/he may have knowledge of and access to many services or resources within the LEA and community human service delivery system; however, s/he may lack specific information concerning the services within specific systems, e.g., special education classroom or special services within the community or concerning the needs of the handicapped child.

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[2] According to the 121 a. 343 of the rules and regulations, each public agency is responsible for initiating and conducting the meetings for the purpose of developing, reviewing, and revising a handicapped child's IEP. Because this individual is a representative of the public agency, it is assumed that s/he will be responsible for initiating and conducting the meeting.

If the LEA is the building principal, s/he may have easy access to resources within his/her own building but not to resources on a systems-wide basis. Similarly, if the representative is a teacher or a consultant, s/he may be aware of the child's needs but not the resources available to meet these needs.

An advantage to appointing a special education director as the representative is that s/he may have knowledge of the child's needs[3] and the system's resources; however, if the LEA has not merged special services and regular services into one human service delivery system, this individual may not have knowledge of or access to services within the environs of the regular program.

The success of the IEP process will depend, in part, upon the capability of the interrelated systems to develop or coordinate resources to meet the needs of the handicapped individual. The LEA representative plays an important role in this process. In attempting to meet the spirit of the law, a system should ensure that this individual has an awareness of or access to the internal and external resources of the system. This awareness should extend beyond the LEA system. For example, in a community special education model (Apter, 1977; Wirtz & Seay, 1974), the emphasis is on comprehensive coordinated services as defined by the community (local, regional, state, or national).

Development of IEPs	***Required***	***Desirable***	***Ideal***
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.1 A representative of the public agency should be—			
responsible for initiating and conducting the planning meetings	x		

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[3] If the representative is not qualified in the child's suspected disability area, one member of the planning team must be.

	Required	Desirable	Ideal
responsible for contacting the parents concerning the meetings(s)	x		
certified in the child's suspected disability or ensure that such an individual attend the meeting	x		
should possess information concerning the resources available to the LEA		x	
should sit on at least one policy-making body of the LEA			x
2.0 Systems Level			
2.3 Programming and Placement			
2.3.1 Participants: Roles and Procedures			
2.3.1.1 LEA representatives should be from the central office or the building level		x	
2.3.1.2 The public agency should provide the LEA representative with a resource guide that contains possible alternative delivery systems including materials on personnel, services for special and regular education, community, regional, state, and national resources available to the LEA, contact persons, agencies and associations for parents, standard procedures for developing IEPs			x
2.3.1.3 The public agency should be responsible for developing forms and procedures for coordinating community resources, communicating to other agencies, and to the parents			x

Participants in the Meeting: the Child's Teacher.

According to the comments regarding this requirement (112 a 344(2), the child's teacher can be:

(1) the child's special education teacher, including such specialists as the speech-language pathologist;

(2) the regular class teacher, if the child has been previously enrolled in a regular class;

and/or

(3) a teacher qualified to provide education in the type of program in which the child may be placed.

From a system-wide perspective, this requirement is important because the teacher can provide information concerning the characteristics of the environments in which the child has interacted or may interact.

The teacher(s) the public agency designates as a member of these meetings may influence the nature of the IEP system. A teacher should be present to describe the characteristics of environments in which the child will be placed. The planning team should not consider that the "placement" will ensure adequate programming. No two environments are the same. In order to ensure appropriate programming for the child, input concerning interactions with past environments and the characteristics of environments to be considered is necessary.

The designated function of this individual may also influence the character of the IEP system. For example, the child's teacher can serve such multiple roles as resourcer, linker, and decision-maker. Preferably, this individual should be able to participate fully in the planning of the child's program, especially if s/he is to implement elements of the IEP. Recently, special educators have stressed the importance of regular and special class teachers' input into the IEP decision-making process (e.g., Crowell & Rucker; Kaufman, Agard & Semmel, 1974). Teachers are more effective programmers of instruction for the handicapped if they are integrally involved in the development of the IEP (Kaufman, Agard & Semmel, 1973).

	Required	*Desirable*	*Ideal*
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.2 The child's teacher (the special education teacher) should be qualified in the area of the child's suspected disability	x		
1.3.1.2.1 The present teacher should be involved in the IEP process by—			
being informed of his/her possible roles during the meetings		x	
having input concerning his/her functions during the meeting		x	
being informed of other participants at the planning meetings		x	

		Required	Desirable	Ideal
	suggesting possible participants at the planning meetings		x	
	providing information that could define the problem and suggesting possible solutions		x	
1.3.1.2.2	The receiving teacher should attend the planning meetings and–			
	describe the goals, objectives, strategies, materials, and characteristics of the program			x
	participate in the development of the IEP			x
1.3.1.2.2.1	If the receiving teacher does not attend the planning meetings, s/he should receive copies of the total service plan and the individualized education plan and meet with the LEA representative and the parents		x	
2.0	Systems Level			
2.3	Programming and Placement			
2.3.1	Participants: Roles and Structures			
2.3.1.2	Members of teachers organizations (regular and special) should participate in the system-wide planning of the IEP process		x	

Participants: One or Both of the Child's Parents.

The parents are not required by law to attend the meeting(s); however, they have a right to react to the results of the decisions made at these meetings. To ensure the possible participation of parents in the IEP process, the public agency must notify the parents of the meeting early enough, and the meeting must be scheduled at a mutually agreed upon place and time. Also, when notifying the parents, the public agency must inform the parents of other individuals participating in the meeting(s). The rules and regulations also suggest that the public agency inform the parents of their option to bring other people to the meeting.

From a systems perspective, these requirements reflect the intent on the lawmakers' part to include and maximize the resources of the systems involved in the IEP process. If parents are informed that they can bring other individuals, they can determine what inputs are missing by examining the nature of the inputs selected by the public agency. The letter of the law does not require the public agency to initiate such an interchange of resources; however, to meet the intent or spirit of the law, the system should encourage the parent's use of multiple resources or data.

All contacts with the parents, including those that attempt to convince the parents to attend, can be viewed as ones for legal protection of the agency, or, more positively, as for the purposes of gathering as much data as possible about the needs of the child. LEA's should seek this information, especially if the parents do not attend the meeting(s).

The parent can serve several functions within the IEP system. Although parents are to participate in the IEP process, the exact nature of this participation is not specified; therefore, it could range from informed consumer to data gatherer, implementer, and evaluator of the IEP.

At minimum (the letter of the law), the parent[4] should be an informed consumer of information and services. In keeping with the spirit of the law, the parent should be a decision-maker who assumes the joint concern and responsibility for the handicapped individual's needs. The parent should be integrally involved in all decisions concerning their child's needs. From a change perspective, if they are not involved, there is less assurance that the child's needs will be appropriately met.

	Required	Desirable	Ideal
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.3 The parent should participate in the IEP process by—			
being afforded the opportunity to respond to the tentative IEP developed by the agency	x		
being able to suggest changes in the IEP	x		
understanding their roles during the planning meeting		x	

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[4] The public agency must assure that the parents understand the proceedings of the meeting "including arrangement of an interpretor for parents who are deaf or whose native language is other than English."

	Required	*Desirable*	*Ideal*
participating in the development of the IEP, including the goals, objectives, procedures, resources, evaluation criteria and procedures			x
defining their roles in the process			x
understanding the proceedings in their own language or means of communication	x		
2.0 System Level			
2.3 Programming and Placement			
2.3.1 Participants: Roles and Structures			
2.3.1.3 Parents should participate in system-wide planning of the IEP process			x

Participant: The Child.
According to the rules and regulations the child may attend the meeting, when appropriate. This decision may rest with the parents if the child is not of majority age (Sherr, 1977). If the handicapped individual is of age, s/he should be able to make the decision.

This requirement indicates that the handicapped individual over age has the right to attend the planning meeting(s). In keeping with the spirit of the law, the handicapped individual's perceptions of the problem should be considered. If the individual is not of age and does not attend the meeting, procedures for obtaining the child's input, e.g., records of interviews, should be implemented. If the child is severely retarded, the results of careful observations of his/her interactions with the environment and his/her developmental levels should be reported at the planning meetings.

Unfortunately, the letter of the law does not ensure that the handicapped individual will be an "informed consumer" of the services to be provided for him/her. If at all possible, however, the individual should be able to participate in the decision-making process. The handicapped individual can assume the role of *informed consumer* (e.g., the service agencies inform the individual of the proposed changes and in some cases counsel him/her concerning the expectations of the program), a resource (e.g., interviews, observations in natural settings), or a decision-maker (e.g., participating in the development of goals and objectives).

	Required	Desirable	Ideal
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.4 The handicapped individual should participate in the IEP process if—			
s/he can express his/her likes and dislikes		x	
s/he can make choices (engage in logical operations)		x	
s/he has a significant part in the implementation of the IEP (e.g., contracts)		x	
1.3.1.4.1 The handicapped child can participate in the IEP process by—			
being informed of the contents of the IEP		x	
participating in the development of the goals, objectives, procedures evaluation criteria			x
2.0 Systems Level			
2.3 Programming and Placement			
2.3.1 Participants: Roles and Structures			
2.3.1.4 Representatives of handicapped students should participate in the system-wide polling of the IEP process			x

Participant: Other Individuals at the Discretion of the Parents or the Agency. These individuals may be selected according to the needs and/or the presenting behaviors of the handicappped individual (Higgins, 1977); therefore, representatives from other agencies will vary accordingly. To meet the intent of the law, the LEA system should have an awareness of the array of possible resources that may serve the handicapped individual. For example, these individuals could be diagnosticians, supervisors of instruction, siblings of the handicapped individual, or community, regional, or state representatives for the agency or the parents.

The roles of these individuals could be that of resourcer or linker.

		Required	Desirable	Ideal
1.0 Case Level				
1.3 Programming and Placement				
1.3.1 Participants: Roles and Structures				
1.3.1.5	Individuals chosen by the public agency should be selected according to their capacity to provide diagnostic information concerning the child's needs and/or their capacity to offer information concerning possible special services or related services		x	
1.3.1.5.1	Parents should be informed as to the selection of participants by the public agency	x		
1.3.1.5.2	Parents should be able to suggest to the public agency individuals who should be in attendance		x	
1.3.1.5.3	The public agency should be responsible for providing individuals who will facilitate the parents' understanding of the meeting, e.g., an interpreter	x		
2.0 System Level				
2.3 Programming and Placement				
2.3.1 Participants: Roles and Structures				
2.3.1.5	The public agency should develop mechanisms for the coordination of inputs from individuals who are requested by the agency or the parents to attend programming and placement meetings		x	
2.3.1.5.1	The public agency should collect information concerning individuals selected by the parents and the agency in order to plan for the coordination of external and internal resources			x

Participants: Evaluation Personnel.

As stated in the section on assessment, a member of the evaluation team or someone knowledgeable about the evaluation results and procedures must be included in the planning meeting(s). This individual's input is crucial to the development of the IEP because his/her information will be used to determine eligibility for special services and the levels of educational performance. On a case level, it is important that this individual present information that is easy to understand by the parents and the other professions attending the meetings. This individual should also indicate information that s/he considered to be based on fact and that information based upon inferences (e.g., has characteristics of a brain-injured individual). On the system level, the LEA must include evaluation personnel in the total planning of the IEP process in order to prevent the evaluation unit's separation from the programming and placement process (see section on Assessment).

	Required	*Desirable*	*Ideal*
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.6 A member of the evaluation team should participate in the meeting	x		
or			
one individual who has knowledge about the assessment procedures and results should participate in the meeting	x		
1.3.1.6.1 The member of the evaluation team should be qualified in the child's suspected disability		x	
1.3.1.6.2 Evaluation personnel should present results that —			
are easy to understand by the parents and other professions in attendance at the meeting		x	
possess clarity, consistency of findings		x	
are relevant to the goals and objectives		x	
are from multiple resources		x	
contain time involved in administering tests			x
nature of observations			x
length of observations			x
environments for observations			x
individuals responsible for tests and observations		x	
limitations of results		x	
problems encountered during assessment		x	

	Required	Desirable	Ideal
minority reports		x	
suggestions for next steps			x
2.0 System Level			
2.3 Programming and Placement			
2.3.1 Participants: Roles and Structures			
2.3.1.6 Members of evaluation untis should participate in system-wide planning of the IEP process		x	

Participant: A Member of the Private Agency.

If a handicapped child is to be referred to or attend a private school or facility, the "public agency shall initiate and conduct a meeting to develop an IEP in accordance with 121 a. 347." If a representative of the private agency cannot attend, the public agency must use other methods to insure participation. While the LEA and the private facility must work together to develop the initial program, the private facility at the discretion of the LEA, may review and revise the IEP. The parent and an LEA representative must be present to agree upon the proposed changes.

This requirement may facilitate intersystem communication, cooperation, and coordination, and may assure that the handicapped individual can be served effectively by the joint efforts of two or more agencies.

	Required	Desirable	Ideal
1.0 Case Level			
1.3 Programming and Placement			
1.3.1 Participants: Roles and Structures			
1.3.1.7 Private Agencies should participate in the IEP planning process	x		
1.3.1.7.1 The private agency should attend the meetings	x		
or			
Means for participation (e.g., telephone conversations) should be assured	x		
1.3.1.7.2 The private agency should develop an IEP, if the child is to attend the private facility	x		
1.3.1.7.3 The LEA should establish a contact person for private facility in order to facilitate communication		x	

	Required	Desirable	Ideal
2.0 Systems Level			
2.3 Programming and Placement			
2.3.1 Participants: Roles and Structures			
2.3.1.7 The LEA should include representatives from local and regional private agencies in its system-wide planning of the IEP process			x
2.3.1.7.1 The LEA should develop a system-wide procedure for communicating to private agencies		x	

In summary, the IEP system is composed of many interrelated systems with a variety of roles and structures. An LEA's choice of participants in this system and their degree of participation will affect the nature of this system; i.e., the boundaries of the system will be defined by these individuals. In order to fulfill the spirit of the law, each individual must have an integral part in the IEP system.

The systems that comprise the IEP system must be effectively interconnected and defined by all systems involved. A systematic attempt by the LEA to include all systems who are able to offer inputs concerning the needs of the handicapped and the external and internal resources for meeting these needs is necessary.

Information for Programming and Placement.
At the case level, outcomes of planning meetings should include the content of the IEP and the procedures for implementing and monitoring the program. Also, such outcomes as plans for the review and revision procedures should be developed at this meeting(s). The contents of the IEP can be divided into the total service plan (Walker, 1976) and the individual implementation plan. The total service plan should be completed and agreed upon at the meeting(s). Because the detail and length of time required for developing specific individual instructional strategies is typically beyond the scope of the time allotted to planning meetings, the committee can, if necessary, assign this responsibility to an individual(s) who will be responsible for implementing the plan. A means for recording this plan and disseminating it to the participants must be decided at this meeting. Parents must also approve this individualized plan. The following criteria are for the written outcomes of these planning meetings and include criteria for the total service plan and the individualized implementation plan.

At the systems level, the LEA should develop resource materials and procedures that can facilitate the IEP process. Prior to initiating the process, the system should organize planning meetings composed of teachers, administrators, private agencies, regional special education services, parent and student representatives in order to review the external and internal resources for programming and placement. The LEA is viewed as the agency that coordinates the IEP system, which is comprised of many interrelated systems.

Developing IEPs		*Required*	*Desirable*	*Ideal*
1.0	Case Level			
1.3	Programming and Placement			
1.3.2	Programming and Placement Information			
1.3.2.1	An IEP should include a statement of the child's present level of performance	x		
1.3.2.1.1	Statements of present levels of functioning should be based on evaluation results and observations of the participants		x	
1.3.2.1.2	Statements should be accrued from multiple resources		x	
1.3.2.1.3	The child's teacher and parents should provide information concerning present levels of performance		x	
1.3.2.1.4	Statements should be primarily in terms of what the student can do, including behavioral strengths, talents, interests		x	
1.3.2.1.5	Statements should be in the form of observable actions and signs		x	
1.3.2.1.6	Statements should be grouped according to areas of concern		x	
1.3.2.1.7	If grade level scores are used, a pattern analysis of behaviors on the test should be included		x	
1.3.2.1.8	Statements should include how a child approaches a task (e.g., learning styles)		x	
1.3.2.1.9	Levels can be in one or more of the following: language, reading, writing, math, spelling, pre-vocational skills, information-processing skills, affective development, perceptual-motor development, self-help skills, social-interaction skills		x	

		Required	*Desirable*	*Ideal*
1.3.2.1.10	Statements should be child-centered — i.e., statements should extend beyond describing levels in terms of test scores and entry points on tests or commercial materials		x	
1.3.2.2	The IEP should include annual goals, including short-term objectives	x		
1.3.2.2.1	The number of goals depend upon the needs of the child in areas of major concern		x	
1.3.2.2.2	Goals and objectives should be consistent with the evaluation report and statements of educational performance	x		
1.3.2.2.3	Goals can be expressed in annual outcomes and long-term goals, if appropriate, e.g., if related to vocational skills, self-help skills		x	
1.3.2.2.4	Goals should express the desired and expected behaviors of professionals, parents, and the handicapped individual, when appropriate		x	
1.3.2.2.5	Goals should be organized in a priority rating according to importance, sequence of difficulty, natural acquisition, time allocation		x	
1.3.2.2.6	Goals should represent the student's optimum learning style		x	
1.3.2.2.7	Goals should be based on the most appropriate modifiable behaviors		x	
1.3.2.2.8	Short-term objectives should relate to each goal		x	
1.3.2.2.9	Objectives should be stated in terms of what a student can do		x	
1.3.2.2.10	Objectives should be in terms of observable and measurable actions		x	
1.3.2.2.11	Objectives should contain the conditions under which these objectives will be met (e.g., time and place)		x	

		Required	*Desirable*	*Ideal*
1.3.2.2.12	Objectives should be placed in a hierarchy for management and instructional purposes		x	
1.3.2.2.13	Individual responsible for carrying out or facilitating the accomplishment of each objective should be listed		x	
1.3.2.2.14	Standards of performance should be included with each objective		x	
1.3.2.2.15	Procedural concerns, e.g., contact persons for the parents, should be listed		x	
1.3.2.2.16	Special constraints should be listed (e.g., too much activity can cause a seizure)			x
1.3.2.2.17	Evaluation procedures for objectives should be listed		x	
1.3.2.3	A statement of the specific special educational and related services to be provided the child and the extent to which the child will be able to participate in regular education programs should be included in the IEP	x		
1.3.2.3.1	Services provided should be related to the goals and short term objectives		x	
1.3.2.3.2	Services should be listed according to types of services not in terms of specific services available to the system as well as the specific name of the service			x
1.3.2.3.3	Desirable services should be listed			x
1.3.2.3.4	A rationale for actual services offered as opposed to desirable services should be given			x
1.3.2.3.5	If related services are listed, one individual must be designated in writing to coordinate these services with the services offered by the special service unit		x	

		Required	*Desirable*	*Ideal*
1.3.2.3.6	If related services are not within the school district, coordination for standardization of reporting should be included		x	
1.3.2.3.7	One person in the service delivery system should be the designated contact person for the parents, although the parents may contuct any member (role of linker)		x	
1.3.2.3.8	If services are not to begin immediately, the system should record the reasons for delay and provide services in the interim	x		
1.3.2.3.9	Supportive services could include community facilities, e.g., public library.			x
1.3.2.3.10	A statement of the services for the child's future programming should be included.			x
1.3.2.3.11	A statement concerning the relationship of the IEP to the total regular program should be included if the child is to participate in regular education.			x
1.3.2.3.12	The percentage of time in regular programs should be listed.	x		
1.3.2.3.13	The description of the programs within the regular education program should be included.		x	
1.3.2.3.14	Special constraints for the handicapped individual in the regular program should be noted.		x	
1.3.2.3.15	Special compensations by the regular program for these special constraints should be noted.		x	
1.3.2.3.16	A description of the special services available in the regular program should be listed, e.g., teacher can sign, materials are taped, special consultant to classroom.		x	

		Required	Desirable	Ideal
1.3.2.4	Projected dates for initiating services and durations of services.*	x		
1.3.2.4.1	Dates should concur with goals and objectives, i.e., crucial services should be scheduled first.		x	
1.3.2.4.2	Duration should depend on nature of service, e.g., ten week course on auto repair.		x	
1.3.2.4.3.	Dates should be the best estimate of time to complete a task, individual's learning style, age level of individual, entry levels, time constraints of the system.		x	
1.3.2.4.4	Dates should not concur with curriculum schedules for other children but for the best estimate of the handicapped child's ability to complete the tasks			x
1.3.2.4.5	Provision should be listed at the meeting of the procedures for renegotiating the dates.		x	
1.3.2.4.6	Termination dates may extend beyond the annual school year.			x
1.3.2.4.7.	Time lines should be relevant to the immediate needs of the child.		x	
1.3.2.5	Appropriate objective criteria and evaluation procedures* and schedules for determining, on at least an annual basis, whether the short-term instructional objectives are being achieved.*	x		
1.3.2.5.1	Criteria and evaluation procedures should be related to the goals short-term objectives.	x		
1.3.2.5.2	Persons responsible for collecting evaluation results should be named at the meeting.		x	
1.3.2.5.3	Collection of the data should depend upon the nature of the task.		x	

		Required	*Desirable*	*Ideal*
1.3.2.5.4	For effective programming for the total service plan, assessment procedures should be at least twice a year or depending upon the needs for revision.		x	
1.3.2.5.5	For the individual implementation plan, assessment procedures should be at least twice a week, if instruction is daily.			x
1.3.2.5.6	One individual should be designated as responsible for compiling all the assessment data.			x
1.3.2.5.7	More than one setting should be noted for monitoring purposes.			x
1.3.2.5.8	At least two people should be involved in the monitoring of the porgram.			x
1.3.2.5.9	Evaluation procedures should include the teachers' perceptions of the program.		x	
1.3.2.5.10	Evaluation procedures should include the child's perceptions of the program.		x	
1.3.2.5.11	Evaluation procedures should include the perceptions of the parents and administrators.		x	
1.3.2.5.12	Community agencies involved in the program should collect evaluation data.			x
1.3.2.5.13	Evaluations should consider logistical evaluation, e.g., effectiveness of communication, time lines, persons in charge etc.			x
1.3.2.5.14	Criteria should be based on observable actions and signs.		x	
1.3.2.5.15	Criteria should be judged fair, precise, and clear.		x	
1.3.2.5.16	The use of the evaluation information should be noted.		x	
1.3.2.5.17	How often the data is to be collected should be noted.		x	

		Required	Desirable	Ideal
1.3.2.5.18	The level of minimal acceptance for moving from one step in the program to another should be noted.		x	
1.3.2.5.19	A means for collecting the data should be noted, e.g., charting.		x	
1.3.2.5.20	A means for on-going reporting of evaluation data should be noted.		x	

2.0 System Level

2.3 Programming and Placement

2.3.2 Programming and Placement Information

		Required	Desirable	Ideal
2.3.2.1	The system should develop a resource guide that includes available sources in special and regular education, names and positions of staff, materials or materials centers			x
2.3.2.2.	The system should develop procedures for the communication among professionals concerning the writing of goals, objectives, evaluation procedures (e.g., workshops, sandwich seminars, shirtsleeve conferences).			x

1.3.3 Programming and Planning: Process

		Required	Desirable	Ideal
1.3.3.1	The public agency should appoint one representative to coordinate the meetings for the development, review, and revision of IEP's.	x		
1.3.3.2	This public agency representative should inform the parents early enough to insure that the parents will have the opportunity to attend.	x		
1.3.3.3	The scheduling of the meeting should be at a mutually agreed upon time and place.	x		
1.3.3.4	If possible, the meeting should be at a central location for the agency and the parents.		x	
1.3.3.5	The meetings should be in quiet, comfortable settings.			x

		Required	*Desirable*	*Ideal*
1.3.3.6	The public agency should use various methods to insure parental participation, e.g., telephone calls initiated by the representative (not his/her secretary), registered written communications, home visits, visits to place of employment.	x		
1.3.3.7	A record of these communications should be kept.	x		
1.3.3.8	If the parent can not attend the meeting, the public agency should insure parental input by conducting home visits, asking parents to select a representative, and collecting and summarizing all participation with the parents to present at the planning meeting(s).	x		
1.3.3.9	Written communication concerning the meeting shall include purpose, time, location of the meeting, and who will be attending.	x		
1.3.3.10	The parents should be informed that they can bring individuals to the meeting.		x	
1.3.3.11	The public agency should provide parents with a directory of community, regional, state, and organizations that serve their child's suspected disability area.			x
1.3.3.12	The LEA representative should collect all information concerning evaluations, possible resources and services prior to the meeting(s).		x	
1.3.3.13	The LEA representative should provide an agenda for review by the participants at the beginning of the meeting(s).		x	
1.3.3.14	The LEA representative should facilitate participation by assuring that topics for the agenda are covered, that all participants are able to comment, and that all major items are summarized and reviewed.		x	

2.0 System Level

2.3 Programming and Placement

2.3.3 Programming and Placement Process

	Required	Desirable	Ideal
2.3.3.1 The LEA should develop standard processes for the development of the IEP		x	
2.3.3.2 The LEA should develop a timing and steps means of monitoring this process, e.g., a tracking grid including dates, individuals involved		x	

Review and Revision

Important to the decision-making process is the utilization of feedback concerning the consequences of decisions made by the system's participants. Decision-making without adequate attention to appropriate feedback results in an ineffective process for renewal of the system.

At the case level, the rules and regulations require that the child's progress be at least on an annual basis. Unfortunately, such a time schedule, if chosen by the system, does not afford the opportunity to carefully monitor the child's progress. Some provision should be made for continual and on-going assessment. At the planning meeting(s), an individual(s) should be designated as having major responsibility for the regular, on-going review of the child's progress toward his/her goals and objectives. Also, the review process must be the responsibility of all those involved, including the parent and the child, when possible. Revisions may be necessary quite often during the initial stages of implementation. The participants in the planning process should develop procedures for revisions in the program as they are needed.

On the systems level the LEA should review the results of their assessments of the efficacy of their system-wide implementation of IEPs. Information should be collected on such items as number of IEPs developed, number and types of services involved in the implementation of IEPs, types of disabilities identified by the IEP process and evaluation results concerning the perceptions of all those involved in the process. This information should be used for the purposes of restructuring the system as needed, identifying needed resources for the next year and/or subsequent years, and for measuring the system's progress toward meeting the spirit of the law.

1.0 Case Level

1.4 Review and Revision

1.4.1 Review and Revision: Participants Roles and structures

		Required	Desirable	Ideal
1.4.1.1	The meeting(s) for the reviews should include the parents and other individuals involved in the implementation of the IEP	x		
1.4.1.2	An LEA representative should be responsible for conducting and initiating the review and revision meeting	x		
1.4.1.3	The student should participate in the review process, when appropriate			x
1.4.1.4	If the child is in a private agency, this agency may review the IEP at the discretion of the LEA.	x		

1.4.2 Review and Revision Process

		Required	Desirable	Ideal
1.4.2.1	A review should be held at least annually	x		
1.4.2.2	Program review may be based on designated periods, e.g., quarterly		x	
1.4.2.3	Review of the program should occur as often as perceived needed by all those involved			x
1.4.2.4	The purpose of the reveiw meeting should be clearly established by all involved		x	
1.4.2.5	Decisions concerning revisions should be based on evaluation results of initial objectives	x		
1.4.2.6	Time constraints, logistical constraints of the review should be noted			x
1.4.2.7	Provisions for revising goals, objectives, materials, services must be developed (who is responsible, is another meeting of all participants necessary for such revisions)		x	

	Required	*Desirable*	*Ideal*
1.4.3 Referral Information			
1.4.3.1 The review and revision procedures should include –			
–information concerning the procedures for monitoring the program, perceptions of the participants			x
–rationale for revising program		x	
–desirable additional services and personnel		x	
–a statement concerning the relationship of the revisions to the total IEP		x	
2.0 System Level			
2.4 Review and Revision			
2.4.1 Participants: Roles and Structures			
2.4.1.1 The LEA should be responsible for coordinating the procedures for review and revision of IEPs	x		
2.4.1.2 The LEA should establish committees for developing system-wide alternative procedures for review and revision. This committee should include:			
parents		x	
students			x
special class teachers		x	
regular class teachers		x	
administrators		x	
community agencies			x
2.4.2 Review and Revision Information			
2.4.2.1 For the purpose of self-renewal the system should collect information concerning–			
–number of IEPs developed		x	
–number and types of services involved		x	
–time involved from the point of referral to review and revision		x	

	Required	Desirable	Ideal
—estimated cost of each IEP, including number of personnel involved, transportation costs, service costs, materials cost, assessment costs, costs in time to the child, parents, personnel, in-kind donation of services, materials			x
—types of disabilities identified by the IEP process	x		
—evaluation results by all other individuals involved, including perceptions of the program's effectiveness, needed changes, efficiency of operations, maximum utilization of skills			x
2.4.2.2. A committee should review the results of this information and suggest next steps including —			
—steps for greater participation of parents (e.g., if the parents are involved by signing off on IEPs, what steps should be developed to increase participation, e.g., inservice training)		x	
—steps in greater utilization of time (accomplished by analyzing time constraints of yearly evaluations)		x	
—steps toward feedback of the child's progress on more than an annual basis (if the system does not review more than once a year)		x	

In summary, criteria for the implementation of the IEP process was presented in this section. The criteria are placed on a continuum that begins with minimal participation of individuals and minimal utilization of resources of the system and progresses toward maximum participation and maximum utilization. Because each system posseses its own unique constraints, characteristics, and resources, criteria are sufficiently inclusive to allow systems to choose their own means for developing procedures for implemenation. The LEA is viewed as a self-regulating agency that will use criteria to develop procedures that will assist it to progress from its present operating procedures to the development of a self-renewing opening system.

CHAPTER III: CRITERIA FOR THE IEP PRODUCT OR DOCUMENT: A SYSTEMS APPROACH TO PLANNED CHANGE

The LEA's IEP document will reflect its members' perceptions of the necessary inputs, outputs, and processes for developing an IEP. For example, the system's perception of the coordination of services, the flow and nature of services will be represented on the IEP form. Also, the boundaries of the system will be defined by the inclusions or exclusions of information on the document, e.g., number of services agencies listed.

Components of the IEP documents will vary according to their designated functions. The document can serve as a management or total service plan and/or a plan for specific implementation of instruction. Criteria are presented for both. Criteria for the forms will focus on the following considerations: (1) What decisions have been made, (2) By whom these decisions were made, (3) On what bases these decisions were made, (4) What process was used for making these decisions, (5) Mechanisms for feedback concerning these decisions, and (6) Provisions for system self-analysis and self-renewal. Criteria for inputs and outputs for planning implementation, review, and revision of the IEP are presented.

IEP Documents	***Required***	***Desirable***	***Ideal***
1.0 Planning			
1.1 Inputs for Planning			
1.1.1 Forms should include student and family identification	x		
including: Name, age, sex, birthdate, chronological age, grade, (if appropriate), parents' names, public or private educational facility where child is served, guardians' names (if appropriate), address of student, parents, language in the home, language of the pupil.		x	
1.1.2 Forms should include the date of program entry.	x		
1.1.3 Forms should include the name of the handicapped child's teacher(s).	x		
1.1.4 Forms should include lists of major concerns including:			
—area of concern, e.g., self-help skills, persons noting concern, e.g., parents.		x	

	Required	Desirable	Ideal
1.1.5 Forms should include educational levels for at least each area of concern.	x		
1.1.6 Multiple sources for determination of levels should be on forms including at least three from the following area: —standardized norm-referenced and criterion-referenced tests —observations in formal and natural —checklists —rating scales —interviews —informal tests —medical history —developmental summaries		x	
1.1.7 Evaluation information should be presented in more than one format including: —a pattern analysis and descriptions of the child's behaviors on standardized instruments —observable actions and signs —the child's learning approach			x
1.1.8 The handicapped child's behavioral strengths should be noted.			x
1.1.9 The handicapped child's interests should be noted.			x
1.1.10 Dates of assessment should be recorded		x	
1.1.11 Dates and participants of evaluation meetings including the coordinator's name and position should be recorded.			x
1.2 Inputs for Implementation (Outputs from Planning Meeting)			
1.2.1 Forms should include participants at the planning meeting, including the coordinator.	x		
1.2.2 Dates of the meetings should be included.	x		
1.2.3 Goals for each area of concern should be listed in order of priority.		x	
1.2.4 Goals should be in terms of annual goals and long-term goals.		x	

	Required	Desirable	Ideal
1.2.5 Short-term instructional objectives should be listed, including:			
—action of the student (observable actions and signs)		x	
—terminal behavior		x	
—acceptable level of performance		x	
—standards for performance		x	
—priority listing of objectives		x	
—conditions for implementation of objectives		x	
—who is responsible for implementing objectives		x	
—dates of initiation and duration		x	
—objective criteria for evaluation procedures		x	
—frequency of evaluation		x	
—methods for evaluation		x	
—persons responsible for monitoring evaluation procedures		x	
1.2.6 Special services and related services should be noted.			
1.2.6.1 Services for the individual should be recorded on the form.	x		
Rationales for these services should be recorded.			x
1.2.6.2 Persons responsible for implementing these services should be recorded.	x		
Possible alternative services should be listed.			
1.2.6.3 Contact persons for each service should be included.		x	
1.2.6.4 Date of initiation and duration of services should be included.	x		
1.2.6.5 The extent of participation in the regular program, including:			
—percentage of time in program	x		
—rationale for placement		x	
—persons responsible		x	
—major concerns addressed by the regular program			x
—special constraints and compensations			x
—contact persons			x

	Required	*Desirable*	*Ideal*
—groupings in which child will participate			x
—special resources to the regular class teacher			x
1.3 Review (Outputs from Implementation)			
1.3.1 The form should record the results of evaluation of pupil progress in the areas of major concern.		x	
1.3.2 The form should record the person(s) in charge of the review procedures.		x	
1.3.3 Results should be in terms of goals and objectives.	x		
1.3.4 The method of evaluation should be recorded.			x
1.3.5 Frequency of evaluation and persons responsible should be recorded.			x
1.3.6 Major concerns for the review process should be recorded.			x
1.3.7 Persons responsible for these major concerns should be noted.			x
1.3.8 Individuals present at the review meetings and dates of the meetings should be included.	x		
1.3.9 Comments by parents, teachers, administrators, and child concerning effectiveness of program should be noted.			x
1.3.10 Desired additional services, new personnel, materials, should be noted.			x
1.4 Revisions (Inputs from Review)			
1.4.1 On the form should be noted:			
—goal changes		x	
—Short-term objectives, including materials, tools, strategies conditions for implementation		x	
—services		x	
—persons responsible		x	
—persons present at revision meetings	x		

(See criteria for inputs for implementation)

Sample IEP Forms

Forms[1] are presented that include components required by the rules and regulations and information that extends beyond the letter of the law. A form should be a working document that provides the participants with guidelines for implementation, review, and revision of the IEP. Three forms are presented representing a continuum from required to ideal. A critical difference in the final form is that it represents an attempt to collect information regarding the decisions that were made during the IEP process.

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[1] Inputs for the components of IEP documents were collected from the IEP documents of California CSDCS, the Boston City Schools Core Evaluation Process, Indiana, and New Hampshire.

Sample Form A: Letter of the Law

Name ____________ Age ___ Sex ___ Grade ___ Birthdate ________

Parents names ____________________________

Address ____________________ Phone ______________

Child's Teacher (s) ____________________________

School ____________________________

Language of the home ______________ of the child ______________

Date of program entry ______________

I. Present levels of educational performance

II. Annual goals

Goal 1 ____________________________

____

Short-term instructional objectives, including objective criteria and procedures for evaluation

____

____

Goal 2 ____________________________

____

Short-term objectives ____________________________

____

(Attach additional sheets if necessary)

III. Special Education and Related Services

Service agency	Date of Services Beginning	Ending

IV. Extent in regular program

—Percentage of time ______________

—Subjects, activities ____________________________

V. Criteria for evaluction

Format ______________________________

Types of criteria ______________________________

Evaluation procedures ______________________________

Frequency ______________________________

VI. Schedule for Review of Objectives

Annual cases review data ______________________________

Results ______________________________

(Attach sheet, if necessary)

IEP Participants

______________________________ Chairperson

____

____

____

Sample B (Desirable)

I. Student identification

Name ______________________ Sex___ Age___ Grade___ Birthdate__________

School ____

Teacher(s) ____

Parents ____

Address _________________________ Phone ________________

District of residence ____________________________________

Primary language in the home _____________ Of the pupil_______________

II. Major concerns

Area of concern Persons noting concern (including dates)

1. ____

2. ____

3. ____

4. ____

5. ____

6. ____

(Attach additional sheets, if necessary)

III. Assessment information

A. Evaluation procedures (based on areas of concern)
Types of assessment information
—standardized tests (—normed—criterion)
—rating scales—observations (formal, informal)
—interviews—checklists—informal assessment

Persons responsible for evaluations Types of Assessments Dates

1. ____

2. ____

3. ____

(Attach additional sheets, if necessary)

B. Educational levels (in observable actions and signs)

1. Area of major concern
2. Area of major concern
3. Area of major concern

(Attach additional sheets, if necessary)

C. Special constraints

IV. Implementation Information

A. Total Service Plan

1. Area of concern Annual goals (in order of priority)

1.
2.
3.
4.
5.
6.

2. Special services and related services

Type	Name of Agency	Persons responsible	Contact person	Dates Beg./Term.
1.				

(Attach another sheet, if necessary)

3. Extent in Regular Program

Percentage in total program

Teacher(s)

Names of special services involved

Contact person

B. Individualized Education Plan

Short-term instructional objectives	When	Where	Persons responsible	Strategies
Goal 1				
Goal 2				
Goal 3				

Individualized Education Plan (continued)

Short-term objectives	Materials, tools	Objective Criteria	How judged	By whom	How often
Goal 1					
Goal 2					
Goal 3					

V. Participants in Planning, Implementation (Signatures)

Name Position

____ Coordinator

____

____

____

VI. Review

1. Summative data (Scores, checklists, rating scales)

Data	Persons responsible
	(coordinator)
1. ____________________	1. ____________________
2. ____________________	2. ____________________
3. ____________________	3. ____________________

VII. Revisions

(Use information on implementation form)

Persons present at the Review and Revision Meetings (Signatures)

Participants	Date
1. ____	
2. ____	
3. ____	

Sample C. IEP (Spirit of the Law)

I. Student identification

Name ______________________ Sex___ Age___ Grade___ Birthdate__________

School ____

Teacher(s) ____

Parents ____

Address ______________________ Phone __________________

District of residence _________________________________

Primary language in the home ____________ Of the pupil ______________

II. Major concerns

Area of concern Persons noting concern (including dates)

1. ____

2. ____

3. ____

4. ____

5. ____

6. ____

(Attach additional sheets, if necessary)

III. Assessment Information

A. Evaluation procedures (based on areas of concern)
Types of assessment information
–standardized tests (–normed–criterion)
–rating scales–observations (formal, informal)
–interviews–checklists–informal assessment

Persons responsible for evaluations Types of Assessments Dates

1. ____

2. ____

3. ____

(Attach additional sheets, if necessary)

B. Educational levels (in observable actions and signs)

1. Area of major concern ____________________

2. Area of major concern ____________________

3. Area of major concern ____________________

(Attach additional sheets, if necessary)

C. Behavioral strengths ____________________

D. Student's interests ____________________

E. Special Constraints ____________________

IV. Implementation information

A. Total Service Plan

1. Area of concern	Annual goals (in order of priority)	Long-term goals

1. ____________________

2. ____________________

3. ____________________

4. ____________________

2. Special Services and Related Services

Type	Name of agency	Persons Responsible	Contact Person	Dates Beg./Term.

1. ____________________

Rationale:

2.

Rationale:

(Attach another sheet, if necessary)

List alternative services (if any)

____

____

3. Extent in Regular program

Percentage of total program ______________________________

Teacher(s) ______________________________

Major areas of concern to be addressed: ______________________________

____

Special constraints: ______________________________

____

Compensations ______________________________

Grouping ______________________________

Special services available to the regular teacher ______________________________

____

____

Names of special services involved ______________________________

Contact person ______________________________

Review dates ______________________________

B. Individualized Education Plan

Short-term instructional objectives	When	Where	Persons responsible	Strategies
Goal 1				
Goal 2				
Goal 3				

Individualized Education Plan (continued)

Short-term objectives	Materials, tools	Objective Criteria	How judged	By whom	How often
Goal 1					
Goal 2					
Goal 3					

V. Participants in Planning, Implementation (Signatures)

Name Position

______________________________ Coordinator

____

____

____

____

VI. Review

1. Summary of evaluation data

A. Formative (Attach charts, information, etc.)

Frequency of data ______________________________

B. Summative data (Scores, checklists, rating scales)

____

____

____

(Attach a sheet, if necessary)

C. Persons responsible for monitoring procedures

Summative Formative Dates

1. ______________________________ Coordinator

2. ______________________________

3. ______________________________

D. Major areas of concern Persons noting concerns

1. ______________________________

2. ______________________________

3. ______________________________

E. Results of perceptions of program effectives

1. Efficiency (Comments by parents, teachers, administrators, student)

2. Cooperativeness on part of LEA, parents (Comments by LEA representatives, parents)

3. Recommended changes (Comments by LEA, parents, student)

4. Needed additional services, personnel, materials (Comments by parents, LEA, student)

VII. Revisions

Total Service Plan

Major areas of concern Goals (short and long-term)

Services

Type Name of Agency Contact persons

(Use information on Implementation form)

Persons present at the Review and Revision meetings (Signatures)

Date

1. ____________________

2. ____________________

3. ____________________

4. ____________________

SUMMARY

P.L. 94-142. the Education for All Handicapped Act requires that LEA's take a first step toward developing comprehensive, interrelated services for the handicapped. For the spirit of the law to be fulfilled, members of the LEA, community agencies, and the parents should be committed to utilizing all possible resources to meet the needs of the handicapped. The success of the IEP process will be the result of the implementation of such principles of changing as maximum coordination and utilization of external and internal resources and the integral involvement of all participants in the IEP Process.

The LEA's understanding of the nature of the *human networks* necessary for the coordination of the IEP system is crucial to the success of individualized programs for the handicapped. Sarason notes that although tapping into the interlocking networks of the community does not ensure success, it is the "first stage of the process of answering the question: How much support will be required from what networks to provide us with a fighting chance" (p. 327).

The LEA should engage in a process of self-renewal – i.e., a process whereby all participants at all levels of the system's hierarchy engage in the assessment, formulation, implementation, and evaluation of the goals and objectives for the individual and for the system. The system must engage in a constant process of change.

The system's response to the letter of the law can result in its members' attempts to tighten their boundaries for the purpose of protecting their present operating procedures. On the other hand, the response can serve as a catalyst for the development of a "sense of community" – i.e., total commitment by members of each LEA and the community to meet the educational needs of the handicapped.

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PART C

The View from the Panel

INTRODUCTION

The 2-day panel meeting provided an opportunity to bring together a small but diverse group of educators to react to both the study and the IEP position papers. The group included representatives from state and local education agencies, private schools, university departments of special education, and the Bureau of Education for the Handicapped. Following initial BEH presentations by Dr. Linda Morra, Dr. Mary Kennedy, and Dr. Edwin Martin, Deputy Commissioner of BEH, which set the general context for the study, authors presented summaries of their papers and responded to questions and comments. During the afternoon, panel members discussed various issues related to the study and/or specific papers. On the second day, small groups were formed to continue discussion of issues and develop recommendations. Following the small group session, a general session was held to share results. The next sections provide an issue-by-issue summary of the panel discussion and recommendations.

THE ISSUES

Problems in Implementation

Investments of time, energy, technology, and other resources were recognized by the panel as being necessary for implementation of the individualized education program provisions of P.L. 94-142, in addition to commitment to educational planning for handicapped children. Participants discussed the conflict which exists between requirements for mass processing of children and the need to individualize diagnostic and programming efforts.

Strategies were suggested to lead to maximum and cost-effective utilization of present available resources. For example, in addition to development of teacher incentives for IEP activities, panel members suggested using available but unutilized time such as informal lunch sessions for inservice activities. Another suggestion, especially relevant for the secondary school level, was use of an IEP manager. As defined by one panelist: ". . . an IEP manager would have the responsibility of providing overall coordination and supervision of the implementation efforts of different educational agents with whom the child is in contact." Instead of six teachers or service providers who work with a particular child all trying to develop the IEP, the delegated case manager would have major responsibility for this function, and, by reporting and offering technical assistance, the IEP manager would also help to insure consistency of IEP implementation.

Panel members also agreed that time demands, now everyone's concern and focus in relation to IEP development and implementation, usually decrease once participants in the process learn to individualize. One panelist expressed it this way: "The first time when you bring a child into the system and [have to] develop an IEP, there's a lot of time, effort, energy and wrong guesses. After you have had experience with the child, your ability to develop a sharp plan increases."

Organizational development efforts, especially at the system level, were viewed as facilitating the implementation of the IEP provisions. Several participants urged that implementation of the IEP provisions be viewed as entailing implementation of a whole decision-making system concerning the educational program for handicapped children. Perhaps, this one comment sums up the response of the panel concerning implementation at the system level: "Let's don't do it piecemeal. Let's get all the interested people – representatives of teachers, representatives of parents at local levels, special educators – and sit down and plan together how we could best implement this [law]."

Finally, panelists reported a general feeling in school systems that the developed IEP document was "cast in stone", and that the problems involved in frequently reconvening all parties involved in developing the IEP were tremendous. General consensus seemed to be that the IEP should be viewed as ". . . making a guesstimate – a best guess – about what's needed and what procedures will produce the [desired] changes." One possible strategy was offered: ". . . if you develop a tentative plan, and you all agree that it's tentative, and you plan a one or three month implementation period where it gets tried out and adjusted . . . you can have one person from your committee work with all the implementation agents involved and assist them and [then] report back to the chairman of the IEP team. If [changes] are of sufficient magnitude that you have to junk the whole program and try something else, then you need another committee meeting." While panelists agreed with this general approach, questions remained concerning its legality.

Quality of Implementation

The panel agreed with the concept of qualitative differences in the implementation of the IEP provisions, both in terms of the process of developing IEPs and the IEP document. Several concerns, however, were expressed. First, panelists generally agreed that criteria used to evaluate the quality of the IEP document should neither equate length of the document with quality, nor result in one standard form or format. Examples were offered of 3-page documents and 15-page documents which really do not say anything in terms of how the child's needs will be met, and both 3-page and 15-page documents that are excellent IEPs. The panel's conclusion was that flexibility should be retained;

qualitative differences will still be obvious. For example, one panelist described a practice of developing one long term goal and one short term objective for each handicapped child in a school district. There was agreement that such practice was not indicative of quality implementation.

The second concern regarded the tendency in behavioral science research to reduce things to the measurable, and to let the measurable determine the value system underlying judgements of quality. In the spirit of individualization and in the drive to make objectives precise and measurable, there can be a tendency to let the objectives dictate the evaluation. The panel concluded that objectives should not be excluded because of difficulty in measurement. The extent to which an educational program has been shaped to meet a child's interest, for example, is as important a criterion as the extent to which it requires academic achievement.

The Efficacy of the IEP

In following the guidelines given to them, authors developed criteria for evaluating the process of developing IEPs, the product or IEP document, and some went ahead and addressed implementation of the IEP. The point was made by the panel, however, that eventually educators are charged with the responsibility of evaluating the efficacy of the IEP developed for any given child. Thus, determinations of quality must involve, for example, not only the completeness of an IEP document for a particular child, but also the validity of the IEP for the child. To illustrate the point, one panelist used the example of an IEP which looks great, but due to a confusion of names, it is an IEP for the wrong child.

There was some feeling that evaluation of the process of developing the IEP is not enough. One panelist made the analogy: "You can have 87 steps to make a movie, but you can still make a lousy movie. The systems for [evaluating the development of] IEPs are content-free." Another panelist, however, came back with the response: "You have to find out if, in fact, you've made a movie before you begin to ask yourself whether it's a good or a bad movie."

The conclusions of the panel seemed to be that first, the system is largely operated by people of integrity who are trying to do what is right for the child. Second, there are built-in safeguards in the process of monitoring and evaluation of IEP implementation which would identify invalid IEPs. For the moment panel members were willing to settle for evidence of a process, but eventually they thought that it would be necessary to get closer to the child and to judgements which may be more subjective in nature.

Self-Study Guides?

There was some discussion of the advantages and disadvantages of producing self-study guides. Some concern was expressed that self-study guides might reduce flexibility and variety in implementation of the IEP provisions by implying a uniform way in which implementation should occur. One panelist warned: "LEAs think [the standard is] written down . . . like Moses and the Tablets . . . and we are going to give it to them — we're going to reveal it to them eventually . . . [It] will give LEAs the feeling that whatever they try to do on their own, can't be as good." There seemed to be some agreement among panel members, however, that guides or models could be used flexibly. As stated by another panelist: "Demands on staff time are absolutely fantastic. [It's] O.K. [for LEAs] to create or design their own models, but they should also have models they can adapt or modify to their own needs." One panelist seemed to sum up the general feeling in this statement: "[I think] that the local school systems really are interested in and would love to have several alternative . . . models from which to proceed. It's dumb for 16,000 different school systems to have to make up their own. [You can say] pick and choose, or do your own, if you want to do your own. But I don't think most people want to do their own."

Panelists did express a feeling that the guides or models could be overwhelming to potential users given that many school systems have limited resources for such activities. They concluded that school systems would have to prioritize their evaluation needs and "zero-in on those areas of particular concern within the IEP process." The guides or models were viewed as being of additional value in helping users to determine priorities.

Use of Self-Study Guides

While the LEA was seen by the panel as being the primary audience for any self-study guides or similar documents, concern was raised that the types of evaluation systems developed in the papers might result in further encumbering the teacher with a lot of paperwork. It was emphasized that this situation would not be desirable. Authors responded that they had envisioned use of the evaluation systems as self-monitoring devices rather than third party evaluation contracts. School-based administrators or supervisors were viewed as the primary users of the systems. There was substantial agreement that the papers did have potential for the kind of process evaluation that would be conducted by administrators or those who are engaged in institutional support activities such as research and evaluation personnel.

Field-Testing and Dissemination

There was much discussion of the advantages and disadvantages of field-testing any developed self-study guides or similar documents prior to wide dissemination. One view was expressed in this panelist's remarks. "Right now, it seems to be right – not in a year and a half, but right now, it seems to me, the school districts need guides about what they should be doing and how they can do it better." The opposing view was best expressed in these statements: "[LEAs] don't want to see these models until they've been field tested. They want somebody to try these out and find out where the bugs are . . . [They need] information such as here's what it's going to cost per child. Here's the time it seems to take. Here are the particular problems that the staff seems to have had with this model . . . This part seemed to work for these types of people in this type of setting. This one doesn't seem to work for this but it does work here." A third view offered was that field-testing and dissemination could be conducted at the same time. No consensus was reached on this issue.

THE RECOMMENDATIONS

All three of the panel subgroups recommended the development of guides or models which would offer alternative self-study techniques to LEAs. The groups differed, however, in their descriptions of the focus of models or guides, the development of the materials, and/or field-testing and dissemination strategies. Group I basically recommended that state level organizations develop, field-test, and disseminate self-study guides which would provide alternative evaluation strategies for each component of a total child planning and programming system. Group II concluded SEAs, with BEH support, should develop evaluation models which would form the basis for technical assistance workshops at the LEA level. At the workshops, LEAs would receive assistance in selecting, adapting, or creating models to reflect their own philosophies and concerns. Finally, Group III suggested the development of a technical assistance document which would present a range of critical events and a variety of alternative approaches to implementing each event, including materials and resources as well as evaluation alternatives.

Group I

As viewed by this group, the individualized education program process includes a collection of steps which take place before the IEP is developed and a series of steps which follow the development of the IEP. The basic steps in this child planning and programming process are (1) screening and referral, (2) assessment, (3) IEP development, (4) IEP implementation, (5) IEP evaluation, and (6) IEP in-service activities. The last step was actually seen as an activity which interfaces with the other 5 components of the process.

Group I recommended the development of a self-study guide which would present alternative evaluation strategies for each of the component steps. The evaluation strategies would present 5-6 major ways to evaluate each component using different sources of information. Emphasis was placed on generating alternatives to the use of standardized achievement tests in evaluating the effectiveness of an IEP for a given child.

The group also provided examples of some of the questions which the evaluation would address. For the component of screening and referral, for example, a question was: "How do you know that you have identified all children eligible for special education and related services?" After the IEP is developed an evaluation question would be: "Is the IEP relevant?" And finally in the evaluation (or annual review) of the IEP, the major question of the evaluation would be: "What has been the value to the child?"

Field-testing of the self-study guides was an idea strongly endorsed by this group. As stated by one member of the group: "As you develop [the evaluation systems], you should field test them for efficacy – for management feasibility." The group felt that there was need to determine the time requirements of implementing this type of evaluation plan, as well as the time requirements of the various evaluation strategies presented for each component. The group suggested trying the self-study guide in a few key districts or selecting a variety of sites and having them use the guides for a year. Finally, the group recommended involving state level educational organizations in the development, field-testing, and dissemination of the self-study guide.

Group II

This group also recommended that a variety of evaluation alternatives be laid out from which LEAs could select. They differed, however, in the methods they would use to develop and present the alternatives. The group felt that papers, models or self-study guides by themselves would not be very effective as technical assistance vehicles. One panelist seemed to sum up the groups response in this statement: "To have [models or guides] be really useful, we would need to have people feel that they were involved in creating them."

Accordingly, the group focused on providing technical assistance in a manner which would stimulate the creativity of LEA personnel. The group recommended that first BEH support SEAs in the development of alternative models and specification of their underlying philosophies. These models would be presented to LEAs at technical assistance workshops. The purpose of the workshops would be to help LEA personnel think through what they want to know about IEPs or the IEP process, and modify or create models as local needs dictate. The rationale for the recommendation was expressed during the group's presentation to the panel; "We felt that it was not enough just to say, here are these alternatives, but rather that we present them in a way to suggest that here are some things that might stimulate your own thinking so that you can develop your own methodologies for evaluating your own concerns."

The group pointed out that LEAs must be free to choose their own priorities. An LEA might be interested, for example, in evaluating the efficacy of the administration of the IEP process, evaluating the utility of IEP documents to teachers, or assessing the effectiveness of the IEP in terms of child outcomes. In the workshops, assistance could be given in defining priorities, selecting an appropriate model, and developing the model to a complete form which would meet local needs.

Group III

This group also recommended that a variety of acceptable alternative approaches be provided to LEAs, but placed emphasis on implementation, rather than evaluation, strategies. The group concluded that there was need for a technical assistance document (TAD) and, unlike the two other groups, indicated that the document should not be restricted to the IEP provisions. Instead it should also encompass the least restrictive environment, non-discriminatory testing, and due process provisions.

The group viewed the TAD as presenting a range of Marker Events with a variety of acceptable and unranked alternative approaches to implementing each event. For each approach, resources and evaluation alternatives would also be delineated. An illustration of alternative approaches to a Marker Event was offered:

Marker Event: Specific Annual Goals

1. Child's teacher contributes a set of tentative goals.
2. Teacher and child study team review and select annual goals from a general "pre-packaged" master set of goals.
3. Child study team develops a tentative set of annual goals in IEP meeting.
4. All potential service providers participate directly in the development of annual goals in IEP meeting (include parent and child, when appropriate).
5. Child's teacher consults with all potential service providers, including parents and child, and represents their input in the development of annual goals in the IEP meeting.

Further, it was explained that a grid which listed all of the resources required to implement each approach could be developed. The grid could enable administrators to assess currently available resources and determine the resources that would be needed to implement a more intensive approach to the delivery of a service.

This group, instead of formal field-testing, recommended that the developed technical assistance document be disseminated immediately to cooperating LEAs, who would agree to provide structured feedback to BEH. LEAs would be requested to take segments of the TAC which reflected their priorities in implementing P.L. 94-142, to indicate for those segments which approach was used, which approach would be used the following year, and which, given optimal resources, would be selected. Feedback from the LEAs would also indicate the usefulness of specific procedures and suggest additional procedures. Based on the feedback, BEH could then make a decision as to whether to support the development of self-study guides.

SUMMARY AND CONCLUSIONS

Commonalities among the three subgroups can be identified as follows:

1. Two of the three subgroups identified need for evaluation methodologies which would have use for LEAs interested in evaluating implementation of the IEP provisions. The third subgroup saw more need for a technical assistance manual than for evaluation methodologies, at least for now. The technical assistance document would emphasize strategies for implementing the IEP provisions. All three of the subgroups saw primary need for materials at the LEA level.

2. Two of the three subgroups viewed IEP activities as encompassing a child planning and programming process. This process would include, for example, screening, referral, and assessment activities. These subgroups did not believe that IEP activities should be analyzed in isolation from the rest of the system.

3. Again, two of the three subgroups viewed state education agencies or state level education organizations as taking an active role in the development of materials. One of these groups did feel, however, that while SEAs could provide technical assistance, LEAs had to select and develop evaluation models which would meet their own specific needs.

The BEH currently has underway a planning year for a national survey of IEP documents. This effort should result in a checklist for analyzing IEPs which can be disseminated as another evaluation option for interested education agencies. The checklist, in addition to the position papers presented in this monograph, are disseminated in the hope that they will stimulate other thoughts on evaluation of implementation of P.L. 94-142 IEP provisions. Panelists found the papers useful, and spoke of taking the position papers home and sharing them immediately with others whom they thought would be interested. It is hoped that the ideas in the papers will similarly be shared and discussed.

IEP CRITERIA STUDY PANEL MEETING

Participants

Ms. Beverly Brightly
State Plan Officer
Division of Assistance to States
Bureau of Education for the Handicapped

Mr. Steve Checkon
Educational Service Center
Montgomery County Schools
Rockville, Maryland

Dr. James Gallagher, Director
Frank Porter Graham Child Development Center
University of North Carolina

Dr. Pat Gillespie
Consultant
Dover, New Hampshire

Dr. Dwight Goodwin, Coordinator
School Psychology Program
San Jose University

Mr. Richard Hills
Assistant Superintendent of Curriculum and Instruction
Alexandria City Public Schools
Alexandria, Virginia

Dr. Richard Iano
Department of Special Education
Temple University

Dr. Mary Kennedy
Acting Chief
State Program Studies Branch
Division of Innovation and Development
Bureau of Education for the Handicapped

Dr. Fred Kladder
State Coordinator for the Emotionally Disturbed and Learning Disabled
Division of Special Education
State Department of Indiana

Mr. Steve Kukic, Director
Educational Services
American Institute for Mental Studies
Vineland, New Jersey

Dr. Edwin Martin
Deputy Commissioner
Bureau of Education for the Handicapped

Mr. Daniel Macy, Principal Evaluator
Special Education, Research and Evaluation
Dallas Independent School District
Dallas, Texas

Dr. Garry McDaniels, Director
Division of Innovation and Development
Bureau of Education for the Handicapped

Dr. Linda Morra
Education Program Specialist and Chairperson
State Program Studies Branch
Division of Innovation and Development
Bureau of Education for the Handicapped

Dr. Pat Morrissey
Education Program Specialist
State Program Studies Branch
Division of Innovation and
Development
Bureau of Education for the
Handicapped

Dr. Robert Palk
Special Education Area
The University of Alabama

Mr. Ray Simches
Division of Assistance to States
Special Assistant to the Commissioner
Bureau of Education for the
Handicapped

Dr. Beth Stephens
Special Education Department
University of Texas at Dallas

Ms. Francie Vlasak
TEAM Associates, Inc.
Washington, D.C.

Dr. Hill Walker
Department of Special Education
University of Oregon

Dr. Stillman Wood
Director of Special Services
Olympia Public Schools
Olympia, Washington